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SUPERDRY WASTEWATER POLICY

Superdry is a Signatory Brand to ZDHC, as of 2024, and committed to the adoption of the ZDHC MRSL and Wastewater Guidelines.

Supplier Requirements
All Suppliers must be legally compliant with all local and national laws, in their regions, for wastewater discharge and effluent treatment.

It is a Superdry supplier responsibility to ensure that any wastewater produced by their facility, or any facilities they utilise, is treated correctly to meet required standards, untreated effluent must never be discharged directly to the environment, all wastewaters should be treated in a monitored ETP (effluent treatment plant) before discharge.

All Superdry suppliers must be part of the ZDHC Supplier to Zero Programme, connect with Superdry on the ZDHC platform, and commit to the adoption and implementation of the ZDHC MRSL and ZDHC Wastewater Guidelines.

All suppliers must also cascade these requirements to all of their supply chain partners, making or processing products for Superdry, and ensure they are also adopting the ZDHC MRSL , implement the ZDHC Wastewater Guidelines and become a part of this ZDHC Supplier to Zero programme, where applicable, and connect with Superdry on the ZDHC platform.

All new suppliers and supply chain partners must, in the first instance, fill in a **Superdry Preliminary ZDHC Form,** so we can access your ZDHC Scope and your Wastewater usage and discharge type. This will establish if you are in scope or not and your ZDHC requirements.

We require you to also engage with the ZDHC Academy and the relevant ZDHC training modules on Wastewater and, in addition, we will also provide you with training on Superdry's Chemical Compliance requirements and Roadmap to Zero.

If you or your supply chain are in scope you will need to produce biannual, twice yearly, ZDHC Clearstream reports and provide full visibility of these reports to Superdry by disclosing results on the ZDHC platform.

The objective is for all wastewater facilities to be fully compliant to the ZDHC MRSL and prove their MRSL compliance through the ZDHC Clearstream reporting.

The ZDHC Wastewater Guidelines explain ZDHC's wastewater requirements and has links to relevant supporting documents.
The current version can be accessed through the link below:
https://downloads.roadmaptozero.com/output/ZDHC-Wastewater-Guidelines

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The ZDHC Wastewater Guidelines will explain to you the why this is important, scope, wastewater discharge types, MRSL wastewater parameters and reporting limits and information on Sludge, Microfibres and the Candidate List.

The ZDHC top line Summary Background and Objectives of the Wastewater Guidelines are summarised below:

SUMMARY Background
The Wastewater ZDHC Guidelines sets out limits for wastewater in terms of 'conventional' parameters (e.g. temperature, pH), heavy metals and chemicals listed on the ZDHC Manufacturing Restricted Substances List (MRSL).

Chemicals, such as heavy metals, can accumulate in sludge, the limits for which are accompanied by recommended disposal pathways dependent on the type and level of chemical contamination.

It is expected that brands, suppliers, and other stakeholders adopt and implement the wastewater and sludge limits. Suppliers should conduct tests, check results and where appropriate, adjust chemical inputs or effluent treatment processing and dispose of the sludge via the recommended pathway.

The WW Guidelines provide requirements for different effluent treatment models and clarify the type of suppliers that are in scope. It also provides details of sampling, testing and reporting requirements and directs the reader to more detailed supporting documents where appropriate.

Objective
The purpose of the ZDHC Wastewater Guidelines is to set a single, globally unified expectation for sampling, testing, and reporting industrial wastewater and sludge resulting from wet processing across the textile, apparel, leather and footwear industries.

The WW Guidelines provide criteria for wastewater and sludge quality to be monitored by suppliers so that these do not negatively impact the environment. Providing details of sampling, testing and reporting requirements. And enabling the sharing of verified data via a secure ZDHC platform between suppliers and brands.

Failures
Any reports illustrating non-compliance, where a facility's wastewater test results do not meet the requirements outlined in the ZDHC Wastewater Guidelines must be addressed.

Consequences of Failure:
The supplier must provide a Root Cause Analysis (RCA) and a Corrective Action Plan (CAP) to address the non-compliance and prevent it from recurring.
Supplier must work with Superdry towards compliance and corrective action, failure to do so may result in Superdry's exit.

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Please see link below to supporting document template for the RCA and CAP.
[ZDHC Wastewater & Sludge RCA & CAP Template]

Common Reasons for Failure:
Failures can be due to various factors, including:

- **Inadequate wastewater treatment:** The facility's treatment system may not be properly equipped or operated to remove the failing chemical or parameter.
- **Use of prohibited chemicals:** The facility may be using chemicals that are on the ZDHC's Manufacturing Restricted Substances List (MRSL) or that are not permitted in the ZDHC Wastewater Guidelines.
- **Contamination:** Contamination from raw materials, water sources, or other sources can also lead to failure.

Corrective Actions:
The corrective actions taken by a facility will depend on the root cause of the failure, but may include:

- **Improving wastewater treatment:** Upgrading the treatment system, optimizing its operation, or implementing new technologies.
- **Replacing prohibited chemicals:** Phasing out chemicals on the MRSL and replacing them with safer alternatives.
- **Improving process control:** Implementing measures to minimize contamination and ensure that the required quality standards are consistently met.

Water Efficiency and Circularity

Suppliers, and supply chain partners, who have water facilities should also be taking steps to improve waster processes, efficiency and circularity. Water conservation and reuse is a sustainability priority and suppliers should be aligned with circular economy principles. Some key aspects which should be addressed by wet processing facilities include:

- **Water Footprint Reduction Targets:** Measurable targets for reducing overall water consumption per unit of production.
- **Water Reuse and Recycling:** Implementing closed-loop systems where treated wastewater is recycled back into production processes like dyeing or washing, significantly reducing freshwater intake.
- **Eco-friendly Materials:** Policies encouraging the use of less water-intensive and less polluting materials which can significantly reduce water usage.