

# **BURBERRY**

**LONDON ENGLAND**

## **MANUFACTURING RESTRICTED SUBSTANCES LIST (MRSL) AND IMPLEMENTATION REQUIREMENTS**

**VERSION FEBRUARY 2020**

# BURBERRY

## Manufacturing Restricted Substances List – Version February 2020

### 1.0 INTRODUCTION

Burberry's Manufacturing Restricted Substance List (MRSL)<sup>1</sup> details the restriction limits applicable to the chemical formulations used in the manufacturing processes of all Burberry textiles, leather, rubber, foam and adhesives across apparel, non-apparel and footwear.

Burberry's MRSL is fully complicit with the ZDHC MRSL, with the exception of poly- and perfluorinated chemicals, where Burberry's restrictions include all long and short-chain PFCs.

The MRSL implementation requirements are included to provide clear guidance on the expectations adopted by Burberry for its business partners.

Burberry Group PLC, London, February 2020

<sup>1</sup>Burberry retains the right to update the MRSL periodically and will ensure any new materials of concern that may be highlighted by regulatory bodies and industry experts are included accordingly.

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Burberry has adopted the Zero Discharge Hazardous Chemicals (ZDHC)<sup>2</sup> MRSL that can be found at this link: [ZDHC MRSL Version 2.0](#) with the additional restrictions of all PFCs as listed in the MRSL addendum 3.1.



### BACKGROUND

The ZDHC MRSL goes beyond the traditional approach to chemical restrictions in finished products (Product Restricted Substances List – PRSL)<sup>3</sup>. This approach helps to protect consumers, while minimising the possible impact of chemicals of concern on workers, local communities and the environment.

The MRSL applies to all chemical formulations used in manufacturing sites associated with Burberry production with the exclusion of substances and formulations used in synthetic and artificial fibre manufacturing.

<sup>2</sup>ZDHC Zero Discharge of Hazardous Chemicals, a group of major apparel and footwear brands and retailers who made a shared commitment to help lead the industry towards zero discharge of hazardous chemicals.

<sup>3</sup>Product Restricted Substance List (PRSL) is a document, which includes limits on finished product and raw material, and can be found at: <https://www.burberryplc.com/content/burberry/corporate/en/responsibility/policies-and-commitments/environment/chemical-management.html>

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## 3.0 MRSL

### PURPOSE

The ZDHC MRSL offers brands and suppliers a single, harmonised list of chemical substances banned from intentional use during manufacturing and related processes in the apparel, non-apparel and footwear supply chains.

It applies to textiles, leather, rubber, foam and adhesives, recognising that these materials use different processes. Filters for each material in the MRSL ensure limits reflect these processes.

### TRANSITION PERIOD

The ZDHC MRSL Version 2.0 was released on 1 January 2020. The transition period from the previous version is expected to be completed by 31 December 2020. During this period, ZDHC MRSL Version 1.1 and 2.0 are both active.

The ZDHC MRSL Version 2.0 is expected to be fully implemented by 1 January 2021.

<sup>3</sup>ZDHC Zero Discharge of Hazardous Chemicals, a group of major apparel and footwear brands and retailers who made a shared commitment to help lead the industry towards zero discharge of hazardous chemicals.

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## 3.1 MRSL ADDENDUM

### PERFLUORINATED AND POLYFLUORINATED CHEMICALS – LONG CHAIN (PFCS) ARE BANNED FROM USE

Chemical Substance Name	CAS Number	MRSL Limit	Notes
7H-Dodecanefluoroheptane acid	No CAS available	2 PPM	
1H,1H,2H,2H-Perfluorooctanesulphonic acid	No CAS available	2 PPM	
2H,2H-Perfluorodecane acid	No CAS available	2 PPM	
Perfluorooctane sulfonate (PFOS and related substances)	Multiple SUM	2 PPM	
1H,1H,2H,2H-Perfluoro-1-Dodecanol (10:2 FTOH)	865-86-1	2 PPM	
Perfluorooctane sulfonamide (PFOSA)	754-91-6	2 PPM	
Perfluorotridecanoic acid (PFTrA)	72629-94-8	2 PPM	
1H,1H,2H,2H-Perfluoro-1-Decanol (8:2 FTOH)	678-39-7	2 PPM	
Perfluoroundecanoic acid (PFUnA)	4234-23-5	2 PPM	
N-ethylperfluoro-1-octanesulfonamide (EtFOSA)	4151-50-2	2 PPM	
Perfluorotetradecanoic acid (PFTeA)	376-06-7	2 PPM	
Perfluorononanoic acid (PFNA)	375-95-1	2 PPM	
2H,2H,3H,3H- Perfluoroundecanoic acid (H4PFUnA)	34598-33-9	2 PPM	
Perfluorodecanoic acid (PFDA)	335-76-2	2 PPM	
Perfluorooctanoic acid (PFOA)	335-67-1	2 PPM	
N-methylperfluoro-1-octanesulfonamide (MeFOSA)	31506-32-8	2 PPM	
Perfluorododecanoic acid (PFDoA)	307-55-1	2 PPM	
1H,1H,2H,2H- Perfluorodecylacrylate (8:2 FTA)	27905-45-9	2 PPM	
1H,1H,2H,2H- Perfluorooctanesulphonic acid (1H,1H,2H,2H-PFOS)	27619-97-2	2 PPM	
Perfluoroundecanoic acid (PFUdA)	2058-94-8	2 PPM	
1H,1H,2H,2H- Perfluorododecylacrylate (10:2 FTA)	17741-60-5	2 PPM	
1H,1H,2H,2H- Perfluorooctylacrylate (6:2 FTA)	17527-29-6	2 PPM	
Perfluoro-3,7-dimethylotanoic acid (PF-3,7-DMOA)	172155-07-6	2 PPM	
2-(N-ethylperfluoro-1-octanesulfonamido-ethanol (EtFOSE)	1691-99-2	2 PPM	
Perfluoro n-decanoic acid (PFDA), sodium salt	38-30-45-3	2 PPM	New
Ammonium pentadecafluorooctanoate (APFO)	3825-26-1	2 PPM	New
Perfluoro n-decanoic acid (PFDA), ammonium salt	31-08-42-7	2 PPM	New

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## SHORT-CHAIN PFCS ARE BANNED FROM USE

Chemical Substance Name	CAS Number	MRSL Limit	Notes
Perfluoropentane – C5F14	355-42-0	2 PPM	
Perfluorocyclobutane- c-C4F8	115-25-3	2 PPM	
1H,1H,2H,2H-Perfluoro-1-Octanol (6:2 FTOH)	647-42-7	2 PPM	
Perfluoro-1-heptanesulfonic acid (PFHpS)	375-92-8	2 PPM	
Perfluoroheptanoic acid (PFHpA)	375-85-9	2 PPM	
Perfluorobutane (PFBS)	375-73-5	2 PPM	
Perfluorobutanoic acid (PFBA)	375-22-4	2 PPM	
Perfluorohexane sulphonates (PFHxS)	355-46-4	2 PPM	
Perfluoro-n-hexanoic acid (PFHxA)	307-24-4	2 PPM	
Perfluoropentanoic acid (PFPA)	2706-90-3	2 PPM	
1H,1H,2H,2H-Perfluoro-1-Hexanol (4:2 FTOH)	2043-47-2	2 PPM	
7H-dodecafluoroheptanoate (HPFHpA)	1546-95-8	2 PPM	
Dodecafluoropentane - C5F12	678-26-2	2 PPM	New
Perfluoro 1-heptanesulphonic acid, potassium salt	60270-55-5	2 PPM	New
Perfluorohexanesulfonic acid (PFHxS), potassium salt	3871-99-6	2 PPM	New
Perfluorbutansulfonic acid, potassium salt	29420-49-3	2 PPM	New

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## 4.0 MRSL IMPLEMENTATION REQUIREMENTS

### SCOPE

All partners associated with the manufacture of any Burberry product are responsible for the correct implementation of the MRSL at their own facilities and with their upstream suppliers, subcontractors and partners.

A complete guide to the implementation process is provided with the chemical management framework described in the Burberry Partner Progress Tool (PPT) in the form of Key Performance Indicators (KPIs) applicable to the different types of facilities (A, B, C and D) as described in the PPT Facility Definitions in Appendix 6.

Chemical management implementation is regularly assessed using the PPT via Burberry, third party and qualified Chemical Managers in the Burberry supply chain. This assessment is used to drive continuous improvement in the supply chain.

### PROCESS

The MRSL implementation process starts with a letter of commitment (see Appendix 2) that is signed (one-off) by the legal representative or the top management of the Partner and should be shared with their Supply Chain Partners and Burberry. A self-assessment conducted with the PPT will highlight the gaps and the opportunities to implement strong chemical management.

The partner shall assign the responsibility of the implementation process to a suitable employee with a direct reporting line to the top management; this person is referred to as the Chemical Manager.

The Chemical Manager shall ensure that the list of chemical formulations (chemical inventory — see minimum requirements in Appendix 3) used in the manufacturing processes associated with Burberry product is regularly updated and that the procurement process of such formulations considers the chemical formulation conformity to the MRSL. The MRSL conformity shall be documented through positive lists, statements of compliance obtained from the chemical suppliers (Appendix 1), testing programmes and databases such as the ZDHC Gateway.

The Chemical Manager is responsible for achieving the highest level of conformity through setting progressive targets for internal processes and upstream and outsourced wet processing.

The Chemical Manager is expected to implement ongoing training and education to employees and upstream suppliers and should attend ZDHC-accredited training where possible. Training resources are available through the [ZDHC Academy](#).

Burberry Partners are expected to review their facility, their upstream suppliers and subcontractors' progress against the KPIs set in the Burberry PPT. This tool will enable them to drive continuous improvement through the scoring mechanism that will be taken into account when taking business decisions.

The Burberry PPT details a number of other expectations in the form of KPIs that are specifically designed to achieve the ultimate goal of eliminating the use and the release of hazardous chemicals from all manufacturing processes with benefits to the environment, the workers, the communities and consumers.

## 5.0 REFERENCES

[Burberry Chemical Management](#)

[Burberry Responsibility](#)

[ZDHC](#)

[ZDHC MRSL 2.0](#)



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## 6.0 DEFINITIONS

<b>Article</b>	Refers to style or material.
<b>CAS Number</b>	Unique numerical identifiers assigned by Chemical Abstracts Service to every chemical substance.
<b>Chemical Formulation</b>	A proprietary mixture of chemical substances that is available for purchase from chemical suppliers under their own trade name.
<b>Chemical Manager (CM)</b>	A person responsible for implementing Burberry's chemical management requirements in all Burberry production and processes.
<b>Chemical Manager Community</b>	Community of Chemical Managers (related to vendors and suppliers) that receives monthly updates on chemical management activities and that participates in training and sharing of initiatives.
<b>CMS</b>	Chemical Management System.
<b>Conformance Levels</b>	Assigned to chemical formulations by accredited third-party certifiers to show how confident you can be that a chemical formulation would always conform (Level 0 is the lowest level of confidence and Level 3 is the highest).
<b>ETA</b>	Ethical Trade Audit.
<b>Finished Goods Vendors</b>	Any company that supplies Burberry with finished goods.
<b>KPI</b>	Key Performance Indicator, a measurable value that demonstrates how effectively an activity is implemented.
<b>Limit</b>	Maximum contamination limit.
<b>MRSL</b>	Manufacturing Restricted Substances List.
<b>NA</b>	Not Applicable.
<b>Positive List</b>	A list of full chemical formulations that comply to a standard (in this case, the ZDHC MRSL + full list of PFCs)
<b>PPM</b>	Parts Per Million, equivalent of mg/kg.
<b>PPT</b>	Burberry Partner Progress Tool, the framework used to implement the chemical management expectations.
<b>PRSL</b>	Product Restricted Substances List.
<b>Raw Material Supplier, Trims Supplier</b>	Any company that supplies goods or a service to Burberry PLC directly or indirectly. This includes but is not limited to printing, weaving, knitting, dyeing, processing, etc.
<b>Root Cause Analysis (RCA)</b>	Method of problem solving, by identifying the cause of the failure and why it is happening.
<b>RM</b>	Raw Material.
<b>Sustainable Manufacturing Champion</b>	Chemical Managers who become specialists in a given topic or theme e.g. Partner Progress Tool, ChemIQ, waste water, etc.
<b>Upstream Supplier</b>	Any sub-supplier of Burberry product.
<b>Wet Process</b>	Any manufacturing process that makes use of water in association with chemicals, such as garment dyeing, laundering, printing, dyeing, finishing, tanning etc. Also any process that discharges waste water (special cases: digital printing is a wet process when the Chemical Managers and the fixation are performed in the same facility; placement print is a wet process when the facility discharges waste water for example from screen/cylinder washing).
<b>ZDHC</b>	Zero Discharge of Hazardous Chemicals, a group of major apparel and footwear brands and retailers who made a shared commitment to help lead the industry towards zero discharge of hazardous chemicals.
<b>ZDHC Academy</b>	A training platform for sustainable chemical management.

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<b>ZDHC Gateway – Chemical Module</b>	An online database that provides an easy way to register and browse safe and sustainable chemistry solutions. This builds trust and reduces the administrative burden.
<b>ZDHC Gateway – Wastewater Module</b>	An online platform to upload waste water test reports and share the results simultaneously with all clients.
<b>ZDHC InCheck</b>	A report to show how much a chemical inventory conforms to the requirements of the MRSL.
<b>ZDHC Wastewater Guidelines (WWG)</b>	A standard for waste water discharge and sludge quality.

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## 7.0 APPENDIX 1

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### Chemical Supplier Statement of Compliance

Supplier: [CHEMICAL SUPPLIER COMPANY NAME]  
Location: [COUNTRY]  
Date: [XX.XX.XXXX]

To the attention of:  
[PARTNER COMPANY NAME]

[Product A]  
[Product B]  
[Product ...]

The above products do not intentionally contain any substances listed in the MRSL.

The substances listed in the MRSL are not used during the manufacture of formulation or the ingredients that provide the properties of the finished product.

They may be present as trace impurities below the limits of the MRSL.

Yours sincerely,  
[Name]  
[Job title]  
[Company]

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## 8.0 APPENDIX 2

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### [Partner] Chemical Management Policy

Supplier: [PARTNER COMPANY NAME]  
Location: [COUNTRY]  
Date: [XX.XX.XXXX]

[PARTNER ORGANISATION] is committed to the elimination of hazardous chemicals in all chemical formulations used in manufacturing processes associated with Burberry product.

We commit to the implementation of the MRSL and requirements outlined in the MRSL Guidance Document for all raw materials and chemical formulations associated with Burberry product.

This commitment extends to ensuring all chemical suppliers and upstream suppliers are meeting the minimum requirements of the MRSL implementation guidelines.

We believe in the importance of eliminating these chemicals for the health of our employees, the environment and the public.

This document shall be reviewed annually as part of a Chemical Management Review.

Yours sincerely,  
[Name]  
[Job title]  
[Company]

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## 9.0 APPENDIX 3

### CHEMICAL INVENTORY MINIMUM REQUIREMENTS

Formulator Name	
Formulator Address (incl. production location)	
Formulation Name	
CAS Number (if applicable)	
Invoice Reference	
Delivery Date	
Net Unit (+unit measure)	
MSDS	
MRSL Compliant (incl. version)	
Certification Type (if applicable)	
Shelf Life	
Intended Use Category	

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## 10.0 APPENDIX 4

### BURBERRY PARTNER PROGRESS TOOL IMPLEMENTATION FRAMEWORK

INTERNAL IMPLEMENTATION	KPI	SCORE					APPLICABILITY				WEIGHTAGE	REMARKS
		0	1	2	3	4	A	B	C	D		
	1. Attitude	Negative		Neutral	Positive	Proactive					3	<b>Negative</b> = Shows little/no interest or engagement in sustainable manufacturing. Low understanding of initiatives. <b>Neutral</b> = Expressed interest in the involvement of the Chemical Manager Community. Adopting some initiatives but not all. <b>Positive</b> = Participation in the Chemical Manager Community. Shows proactivity in the adoption of initiatives. Transparent with Burberry/other Supply Chain partners. Regular communication with Burberry/other Supply Chain partners. <b>Proactive</b> = Active participation in the Chemical Manager Community (e.g. acting as a Sustainable Manufacturing Champion). Goes beyond expectations and leads the adoption of initiatives and targets. Leads joint meetings. Transparent and actively communicates with Burberry/other Supply Chain partners. Regular communication with Burberry/other Supply Chain partners.
	2. Commitment	No			Yes and shared with Burberry	Yes and shared with Burberry and other partners in the Supply Chain					1	– MRSL Commitments should be signed and documented [Appendix 2 of MRSL]. – Each partner should share MRSL Commitments with other tiers of the Supply Chain (upstream and downstream) and this should be done with every MRSL update.
	3. Appointment of Chemical Manager (CM)	No	Chemical Manager formally appointed but not engaged	Chemical Manager formally appointed and engaged	Chemical Manager appointed and trained	Chemical Manager appointed, trained and qualified via third party					1	– The Chemical Manager role should include a named point of contact and should be communicated to Supply Chain partners. It should be updated as the organisation changes (e.g. change of personnel). – The role should be documented in the company organisation chart with direct reporting line to top management. <b>Engaged</b> = Directly involved in chemical management activities. <b>Trained</b> = Informed and introduced to the CMS Manual and the PPT KPIs in person, via ZDHC-qualified training attendance (e.g. Academy and NimkarTek) and through joint visits with qualified CMs, etc. <b>Qualified</b> = Has performed PPT assessment with suppliers, PPT self-assessment or has a PPT score confirmed with tolerance through third-party audit (i.e. performed by a qualified auditor/CM).

☒ Applicable  
☐ Not Applicable

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INTERNAL IMPLEMENTATION	KPI	SCORE					APPLICABILITY				WEIGHTAGE	REMARKS
		0	1	2	3	4	A	B	C	D		
	4. Burberry Ethical Trade Chemical Questions	If any of the ETA questions are answered 'No'				If all the ETA questions are answered 'Yes'					1	– If any ETA questions are answered 'No' the PPT final score will be decreased to the lower colour category (e.g. from Green to Amber). Corrective actions must be implemented within 3 months.
	5. Environmental Management System (EMS) in place	No		Yes, self-developed (no ISO certification)		Yes (with internationally recognised certification)					1	The EMS should include priorities, goals and actions for 3+ years and should also: a) Address facilities' significant environmental impacts and compliance obligations as prioritised in an environmental impact assessment. b) Be supported by factory leadership. c) Be communicated to all employees (through documentation and/or employee interviews). – The strategy should include plans for achievement that detail: 'What will be done?', 'What resources will be required?', 'Who will be responsible?', 'When will it be completed?' and 'How will results be evaluated?'. – Accepted environmental-related certification includes, but is not limited to: Leather Working Group (2018), ISO 14001, EMAS, verified Higg FEM 3.0 level 2 and STeP Level 2.
	6. Chemical Management System (CMS) in place	No		Yes (basic documentation)		Yes (with system documentation, supported with actions and recognised certification/management system)						Partner should use the ZDHC Chemical Management System (CMS) manual as a reference tool. Each organisation implementing a CMS needs to define the scope (boundaries) of their CMS by describing and documenting the extent of the Supply Chain to which the CMS applies. The scope may include only the organisation's specific operating units or more broadly part or all its value chain. At a minimum, it is recommended that all production facilities or units are included in the CMS. A good CMS has several key elements (where relevant): – Roles and responsibilities – Policy statement and MRSL commitment – Risk assessment of chemicals – Supply Chain Mapping and qualification – Supplier procurement practices and chemical purchasing practices – Chemical inventory – Storage and containment precautions – Communication of hazards – PPE selection/safe use procedures – Chemical emergency response plans – Hazardous waste disposal – Training policy and management  Accepted Chemical Management-related certification and tools include, but are not limited to: Bluesign, STeP Level 2, 4 Sustainability Advanced Level and other accepted current and future ZDHC Certifiers.

☒ Applicable  
☐ Not Applicable

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INTERNAL IMPLEMENTATION	KPI	SCORE					APPLICABILITY				WEIGHTAGE	REMARKS
		0	1	2	3	4	A	B	C	D		
INTERNAL IMPLEMENTATION	7. Regulatory Monitoring Process	No		Applicable regulatory identification in place and specific responsibility assigned to internal member of staff or outsourced and permits provided		Proactive regulatory monitoring with specific responsibility assigned and communication of any regulatory changes demonstrated (with documentation)					1	Company shall have a business practice in place including the roles and responsibilities: (1) To address legal compliance with chemicals in products, as well as chemicals used in the input, process and output of the manufacturing facilities, and assign the applicable regulatory identification to a specific position(s) or team, or this can be outsourced. (2) To identify and implement new or changing compliance requirements. (3) To demonstrate legal compliance to waste water regulations. <b>Proactive</b> = ahead of regulatory enforcement.
	8. Communication of Commitment and Guidelines to Internals	No		Initiated communication of commitment and guidelines internally	Communication of commitment and guidelines internally complete (no documentation)	Communication of commitment and guidelines internally complete (with documentation)					1	<ul style="list-style-type: none"> <li>The CMS and MRSL commitment should be communicated amongst all levels of the organisation. Top management should be informed of their roles in managing chemical and environmental impacts. This should include information about the hazards and risks associated with the existing chemical management approach, as well as improvement goals and resources needed for the future.</li> <li>Communication content can include information such as the number of hazardous chemicals and their quantities, target and action dates to eliminate hazardous chemicals, MRSL commitment, etc. and can be done in a variety of ways (e.g. company meeting, email updates, noticeboard and standard operating procedure (SOP) updates).</li> </ul>
	9. Training/Capacity-building of Internal Staff	No	Acknowledged but no action taken yet	(1) Initiated internal staff training using ZDHC-aligned content (2) Documentation of training session and summary	(1) Completed internal staff training using ZDHC-aligned content (2) Documentation of training session and summary	(1) Completed internal staff training using ZDHC-aligned content (2) Documentation of training session and summary (3) Attendance at ZDHC Academy training sessions					2	<ul style="list-style-type: none"> <li>Training must be conducted by the Chemical Manager on MRSL/RSL and CMS.</li> <li>Organisations should ensure that all relevant employees have a foundational knowledge regarding chemical management.</li> <li>The Chemical Manager should participate in ZDHC-sponsored training on chemical management where possible through the ZDHC Academy training and have documentation of training confirmation or a certificate.</li> <li>To ensure alignment to ZDHC content, please register for the ZDHC Academy at <a href="https://zdhc.fta-intl.org/login/index.php">https://zdhc.fta-intl.org/login/index.php</a>, where previous training content from webinars is uploaded.</li> <li>Documentation of in-house training should include: <ul style="list-style-type: none"> <li>a) Job descriptions of participant list.</li> <li>b) Training records with names, date, duration, topic, a brief description of the session and training agenda/trainer.</li> <li>c) If it has been communicated to other Burberry partners.</li> </ul> </li> </ul>

☒ Applicable  
☐ Not Applicable



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INTERNAL IMPLEMENTATION	KPI	SCORE					APPLICABILITY				WEIGHTAGE	REMARKS
		0	1	2	3	4	A	B	C	D		
INTERNAL IMPLEMENTATION	10. Documentation of All Sources of Burberry Production (Raw Material and Processes)	No	Acknowledgement of importance of Supply Chain Mapping with no documentation provided	1-30% Supply Chain Mapping documented and provided	31-60% Supply Chain Mapping documented and provided	>60% Supply Chain Mapping documented and provided					1	<ul style="list-style-type: none"> <li>Complete Mapping of Upstream Supply Chain of the last 12 months (e.g. a vendor should include subcontractors and a converter should include subcontractors, wet processing and raw material suppliers).</li> <li>% refers to: spend or volume in metres, kg, m<sup>2</sup> or units.</li> <li>Trace back one PO for evidence.</li> </ul>
	11. MRSL Communicated to Leather and Textiles Raw Material Suppliers and Subcontractors	No	MRSL communicated to all RM suppliers	MRSL communication to all RM suppliers and commitment received for 1-30% of suppliers	MRSL communication to all RM suppliers and commitment received for 31-60% of suppliers	MRSL communication to all RM suppliers and commitment received for >60% of suppliers					2	<ul style="list-style-type: none"> <li>Upstream Supply Chain to be considered should be relevant to Burberry production.</li> <li>Communication examples include purchase orders, email signatures and emails.</li> <li>In-person communication must be documented.</li> <li>Updated versions of the MRSL must be communicated upon release.</li> <li>MRSL commitment should be saved and documented from Upstream Supply Chain after the Mapping has taken place.</li> </ul>
	12. Chemical Supplier Communication and ZDHC Chemical Gateway	No	(1) MRSL communicated to all chemical suppliers and compliance letters/positive lists requested	(1) MRSL communicated to all chemical suppliers and compliance letters/positive lists received and documented from some suppliers (1-75%) (2) Initiated invitations to the ZDHC Chemical Gateway	(1) MRSL communicated to all chemical suppliers and compliance letters/positive lists received and documented from some suppliers (1-75%) (2) >50% of chemical suppliers registered on ZDHC Gateway	(1) MRSL communicated to chemical suppliers and compliance letters/positive lists received and documented from most suppliers (>75%) (2) >75% of chemical suppliers registered on the ZDHC Gateway					1	<p><b>Example of Positive List</b> = MRSL Appendix 1.</p> <ul style="list-style-type: none"> <li>Communication examples include purchase orders, email signatures and emails.</li> <li>In-person communication must be documented.</li> <li>Updated versions of the MRSL must be communicated upon release.</li> <li>To invite chemical suppliers to the ZDHC Chemical Gateway, please register for the ZDHC Chemical Gateway or invite chemical suppliers through CleanChain functionality.</li> <li>If you have not yet received an invitation to join the ZDHC Chemical Gateway, please contact <a href="mailto:project2020@burberry.com">project2020@burberry.com</a> or alternatively another member of the Supply Chain with a profile can invite you.</li> </ul>

☒ Applicable  
☐ Not Applicable

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INTERNAL IMPLEMENTATION	KPI	SCORE					APPLICABILITY				WEIGHTAGE	REMARKS
		0	1	2	3	4	A	B	C	D		
INTERNAL IMPLEMENTATION	<b>13. Ensure Traceability of Burberry Product Back to Process Recipes and Raw Material Batches</b>	No	Acknowledgement to establish a traceability system, but no action taken yet	Commitment and deadline given to establish traceability system	Internal system of traceability in place (incomplete)	Internal system of traceability in place (with documentation)					1	Supply Chain partners who are using chemicals should ensure that all manufacturing process chemicals be traced from product batch number back to chemical batch number: a) Product batch card including batch number, dates and production quantity. b) Recipe cards, chemical formulation sheets and process instructions containing traceable information (e.g. chemical name, lot number and available quantity). c) Chemical mixing/blending process log, lab records (e.g. colour lab and washing lab). d) Chemical storage log including temporary/working storage and main warehouse with consistent records (e.g. storage in/out log with chemical lot number, quantity and dates stored and dispatched for usage). – Vendors, converter and dry-process partners who do not use chemicals in their own production should ensure that traceability covers point a) listed above. – For non-conformity resolution the information from points a), b), c) and d) should be considered.
	<b>14. CleanChain Adoption/ZDHC Chemical Gateway</b>	No	Chemical user: registration on ZDHC Chemical Gateway  Non-Chemical user: N/A	Chemical user: CleanChain Subscription without total disclosure  Non-Chemical user: registration on ZDHC Chemical Gateway		Chemical User: CleanChain Subscription with regular disclosure of deliveries (chemical) through InCheck reports  Non-Chemical user: CleanChain Subscription					2	– This KPI is both relevant for non-wet processing sites and wet processing sites. – InCheck reports should be shared with Burberry through CleanChain. – Please contact project2020@burberry.com or your Burberry representative to register/ask for a CleanChain demo.
	<b>15. Live Record of a Chemical Inventory</b>	No	(1) Incomplete chemical inventory	(1) Chemical inventory created and regularly maintained							1	Chemical inventory requirements: a) Must include list of all chemicals used (considering the most recent annual consumption) and suppliers of each chemical product (see MRSL Appendix 3). b) SDS must be available for all employees in local language. c) Well marked, designated chemical storage. – Regular maintenance refers to changes such as new chemicals purchased, deliveries, etc. at a sensible cadence (monthly). – The chemical inventory should be a 'speaking document' that is constantly in use in production and also includes commodity chemicals and industrial cleaning agents but doesn't include domestic agents.

■ Applicable  
□ Not Applicable

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INTERNAL IMPLEMENTATION	KPI	SCORE					APPLICABILITY				WEIGHTAGE	REMARKS
		0	1	2	3	4	A	B	C	D		
INTERNAL IMPLEMENTATION	<b>16. Chemical Formulation MRSL Conformity Level</b>	No	1-25% of inventory meets MRSL Conformance Level 1 (Gateway) or ChemIQ ratings Green/Yellow/Orange	26-50% of inventory meets MRSL Conformance Level 1 (Gateway) or ChemIQ ratings Green/Yellow/Orange	51-75% of inventory meets MRSL Conformance Level 1 or above (Gateway) or ChemIQ ratings Green/Yellow/Orange	>75% of inventory meets MRSL Conformance Level 1 or above (Gateway) or ChemIQ ratings Green/Yellow/Orange					3	<ul style="list-style-type: none"> <li>- If a facility chooses not to use CleanChain, it is a mandatory requirement that when performing ChemIQ testing, ChemIQ test results must be published on CleanChain (anonymously).</li> <li>- If a facility disagrees to publishing ChemIQ results, then the score must be capped below the actual score. For example, if a partner scores Level 4 (&gt;75% inventory meets Level 1 or above or ChemIQ ratings Green/Yellow/Orange), the score cannot be higher than Level 3.</li> <li>- The requested Conformity Levels may change in the future.</li> <li>- Score LR (Low Relevance) to vendor without chemical usage.</li> </ul>
	<b>17. Suppliers and Subcontractor Review and Replacement Plan for Non-Compliant/Non-Committed Suppliers</b>	No	Acknowledged but no action taken yet	Supplier and Subcontractor review initiated with estimated date of completion provided	(1) Supplier and Subcontractor review completed (with documentation) (2) Results from the review are included in purchasing decisions	(1) Suppliers and Subcontractor review completed (with documentation) (2) Results from the review are included in purchasing decisions (3) Undergoing replacement with visibility to Burberry (with documentation)					1	<ul style="list-style-type: none"> <li>- Review of suppliers and subcontractors must be done using the PPT Internal Implementation section (see Glossary for relevant upstream supplier) and replacement initiated if action plan for improvements is not implemented.</li> <li>- Please share your findings with Burberry if you have phase-out recommendations of Burberry-nominated suppliers.</li> </ul>
	<b>18. Established Approval Process to Procure Compliant Raw Materials</b>	No	Acknowledged but no action taken yet	Approval process to procure compliant Raw Materials initiated (no documentation)	Approval process to procure compliant Raw Materials initiated (with documentation)	Approval process to procure compliant Raw Materials complete with visibility to Burberry (with documentation)					1	<ul style="list-style-type: none"> <li>- Purchasing contract language to support sourcing PRSL-compliant raw materials (e.g. purchase order or invoice).</li> <li>- Chemical Manager review and approval of purchase order.</li> </ul>
	<b>19. Established Approval Process to Procure Compliant Chemicals</b>	No	Acknowledged but no action taken yet	Approval process to procure compliant chemicals initiated (no documentation)		Approval process to procure compliant chemicals complete with visibility to Burberry (with documentation)					1	<p>Documentation:</p> <ul style="list-style-type: none"> <li>a) Demonstrate access to MRSL conformance level information (e.g. ZDHC Chemical Gateway, CleanChain and Bluesign Bluefinder).</li> <li>b) Chemical inventory includes information on MRSL conformance level.</li> <li>c) Purchasing contract language to support sourcing chemicals on MRSL conformance level (e.g. purchase order or invoice).</li> <li>d) Chemical Manager review and approval of purchase order.</li> </ul>

■ Applicable  
□ Not Applicable

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INTERNAL IMPLEMENTATION	KPI	SCORE					APPLICABILITY				WEIGHTAGE	REMARKS
		0	1	2	3	4	A	B	C	D		
INTERNAL IMPLEMENTATION	20. Implementation of Raw Material (RM) Due Diligence Testing Programme Against Burberry PRSL	Random testing without the engagement of the RM suppliers and without a proper chemical risk assessment	Random testing with the engagement of the RM suppliers and with a proper chemical risk assessment documented		Basic testing program and basic risk assessment conducted with the engagement of the RM suppliers documented	Structured testing programme based on supplier chemical risk assessment and mutually shared test reports with RM suppliers. Documented by Burberry					1	<p><b>Basic</b> = Based on few elements of risk (e.g. only volume, number of suppliers, etc.).</p> <p><b>Structured</b> = Partner should use Burberry DD Calculator or a similar logical approach as reference for risk assessment or demonstrate a structured methodology in place.</p> <p>– Any Burberry-relevant non-conformities should be communicated to Burberry/other Supply Chain partners where relevant and Root Cause Analysis (RCA) and Action Plan completed.</p> <p>– Score LR (Low Relevance) to commission wet-process facility (e.g. commission dyer).</p>
	21. Implementation of Own End Product Due Diligence Testing Programme and Communication of Non-Conformities to Burberry	Random testing without the engagement of the RM suppliers and without a proper chemical risk assessment	Random testing with the engagement of the RM suppliers and with a proper chemical risk assessment documented		Basic testing programme and basic risk assessment conducted with the engagement of the RM suppliers documented	Structured testing programme based on supplier chemical risk assessment and mutually shared test reports with RM suppliers. Documented by Burberry					1	<p><b>Engagement</b> = Test results shared and reviewed with the supplier.</p> <p><b>Basic</b> = Based on few elements of risk (e.g. only volume, number of colours, etc.).</p> <p><b>Structured</b> = Partner should use Burberry DD Calculator or a similar logical approach as reference for risk assessment or demonstrate a structured methodology in place.</p> <p>– Any Burberry-relevant non-conformities should be communicated to Burberry/other supply chain partners where relevant and Root Cause Analysis (RCA) and Action Plan completed.</p>
	22. ZDHC Wastewater Guidelines (WWG) Internal Implementation	Facility only testing for (and consistently meeting) legal requirements	Facility performance WW testing according to the ZDHC WWG with exceptions <sup>1</sup>	(A) Facility performance testing and disclosure of WW according to ZDHC WWG (B) Direct Discharge: Meeting at least Foundational Level for all Conventional parameters (Ref. Table 1 of the WWG) and Detection of one or more MRSL parameters (Ref. Table 2A-N of the WWG) Indirect Discharge: Meeting Discharge Permit Requirements and Detection of one or more MRSL parameters (Ref. Table 2A-N of the WWG) (C) RCA and Action Plan <sup>2</sup> for improvement defined and documented	(A) Facility performance testing and disclosure of WW according to ZDHC WWG (B) Direct Discharge: Meeting at least Progressive Level for all Conventional parameters (Ref. Table 1 of the WWG) No detection of MRSL parameters (Ref. Table 2A-N of the WWG) (C) RCA and Action Plan <sup>2</sup> for improvement defined and documented  Indirect Discharge: N/A	(A) Facility performance testing and disclosure of WW according to ZDHC WWG (B) Direct Discharge: Consistently <sup>3</sup> meeting Aspirational Level for all Conventional parameters (Ref. Table 1 of the WWG) and Consistently <sup>3</sup> No detection of MRSL parameters (Ref. Table 2A-N of the WWG)  Indirect Discharge: Consistently <sup>3</sup> No detection of MRSL parameters					2	<p>According to the ZDHC WWG, testing should be performed twice a year and results should be uploaded on the ZDHC Gateway Water Module by the deadline:</p> <p>(1) Exceptions = Performing test once a year and/or not disclosing on the ZDHC Gateway.</p> <p>(2) To document a RCA (Root Cause Analysis) and Action Plan, the facility can use the template available in the Gateway as an example: 1. Access to your Gateway profile, 2. Download RCA and Action Plan, 3. Fill the document in following the instructions, 4. Upload it again into the ZDHC Gateway.</p> <p>(3) Consistently for more than two consecutive rounds.</p> <p><b>Conventional Parameters</b> = The target should be reaching Foundational then Progressive then Aspirational Level (for direct discharge only).</p> <p><b>MRSL Parameters</b> = The target should be No detection of MRSL parameters (for both direct and indirect discharge).</p> <p>Always check conventional parameters results against your discharge permit.</p> <p>This KPI is not applicable to tanneries until the final version of the ZDHC Wastewater Guidelines for Leather are released.</p>

■ Applicable  
□ Not Applicable

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	KPI	SCORE					APPLICABILITY				WEIGHTAGE	REMARKS
		0	1	2	3	4	A	B	C	D		
INTERNAL IMPLEMENTATION	<b>23. ZDHC Wastewater Guidelines (WWG) Upstream Implementation</b>	No	1-10% of suppliers perform WW testing according to ZDHC WWG and disclose results on the ZDHC Gateway	11-30% of suppliers perform WW testing according to ZDHC WWG and disclose results on the ZDHC Gateway	31-60% of suppliers perform WW testing according to ZDHC WWG and disclose results on the ZDHC Gateway	>60% of suppliers perform WW testing according to ZDHC WWG and disclose results on the ZDHC Gateway					2	<ul style="list-style-type: none"> <li>– According to the ZDHC WWG, testing should be performed twice a year and results should be uploaded on the ZDHC Gateway Water Module by the deadline.</li> <li>– Request supplier to share the ZDHC ClearStream report.</li> <li>– % refers to: spend or volume in metres, kg, m² or units.</li> </ul> <p>For vendors who work with tanneries, only textile suppliers should be considered when measuring the % of suppliers performing waste water testing.</p>
	<b>24. Water Conservation</b>	No measurement of water consumption	Measurement of water consumption (overall process plant) target set for water reduction. Interest in exploring water conservation opportunities	Identified water measurement points for individual machines/ processes. Known consumption of l/kg or l/m². Active participation in water conservation initiatives	Measurement of water consumption of individual machines/ processes. Identification of best available technology with working plan for installation of best available technology for water conservation	Measurement of water consumption of all individual machines/ processes. Best available technology introduced for water conservation. Water-recycling systems in place for process and operational ETPs					2	For more information about water conservation initiatives, please contact <a href="mailto:project2020@burberry.com">project2020@burberry.com</a> .
	<b>25. Air Emissions</b>	Facility-only testing for (and consistently meeting) legal requirements		Facility has control devices or abatement processes for air emission and indoor air quality beyond legal requirements		Facility has implemented modern equipment to reduce or eliminate air emissions and indoor air quality far beyond legal requirements in relation to Nitrogen Oxides (Nox), Sulphur Oxides (Sox) and Particulate Matter (PM)					0	
UPSTREAM IMPLEMENTATION	<b>26. Engagement of Burberry-relevant suppliers to train, support and assess their chemical management against the PPT KPIs</b>	No	1-25%	26-50%	51-75%	>75%					10	<p>% refers to: spend or volume in metres, kg, m² or units. This KPI is to cover the % of the Supply Chain who have had a PPT Assessment. The assessment should be consequent to:</p> <ul style="list-style-type: none"> <li>– Relationship building and going beyond transactional communication (e.g. visits).</li> <li>– Training/capacity building.</li> <li>– Adoption of CleanChain.</li> <li>– Score LR (Low Relevance) to commission wet-process facility (e.g. commission dyer) to beam house and fibre manufacturer.</li> </ul>

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KPI		SCORE					APPLICABILITY				WEIGHTAGE	REMARKS
		0	1	2	3	4	A	B	C	D		
UPSTREAM IMPLEMENTATION	27. Scores of Upstream Suppliers	No	1-25% Green or Amber	26-50% Green, Amber or higher	51-75% Green, Amber or higher with no Red ratings (the remaining 25% would be 'unrated' and at least 40% is Green or above)	76-100% Green, Amber or higher (at least 50% Green or above)					5	<ul style="list-style-type: none"> <li>– % refers to: spend or volume in metres, kg, m² or units.</li> <li>– This KPI is to cover how well the Supply Chain has performed against the PPT Assessment.</li> <li>– Score LR (Low Relevance) to commission wet-process facility (e.g. commission dyer) to beam house and fibre manufacturer.</li> </ul>
CONTINUOUS IMPROVEMENT	28. Implementation plan to continuously improve chemical management	No	Continuous improvement plan initiated	Continuous improvement plan in place documented	(1) Continuous improvement plan in place documented (2) Self-audit process initiated	(1) Continuous improvement plan in place documented (2) Self-audit process initiated (3) Progress tracking regularly shared with Burberry					1	<p>A chemical management implementation plan must not be static. As with any plan, there should be a review process to understand if the plan is on target or needs interim or major adjustment to meet any stated goal. For chemical management, the continuous improvement goal is to move beyond meeting minimum regulatory and industry expectations. Audits can be performed internally or through an external expert.</p> <p>Documented plan for achieving requirements:</p> <ul style="list-style-type: none"> <li>a) What has not been achieved and why?</li> <li>b) People responsible and a targeted date for achieving requirements.</li> <li>c) Description or examples of current chemistry R&amp;D projects/ investments.</li> <li>d) Examples of how responsible chemistry has been incorporated into business agreements.</li> </ul>

☒ Applicable  
☐ Not Applicable

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## 11.0 APPENDIX 5

BURBERRY ETHICAL TRADE CHEMICAL QUESTIONS	YES/NO	COMMENTS
3.7.1 Employees should be protected from chemical hazards and the exposure to chemicals should be minimised.		
3.7.2 Ventilation should be sufficient when using chemicals.		
3.7.3 An inventory of hazardous chemicals should be properly maintained. The inventory should include chemical identification data and the supplier of the hazardous chemical.		
3.7.4 Chemicals should be delivered, handled, transported, stored and disposed of properly.		
3.7.5 Clearly marked, designated areas and temporary storage areas should be provided for the storage of hazardous chemicals.		
3.7.6 All chemicals should be properly labelled, while hazardous chemicals should be properly labelled with warning signs in accordance with the chemical properties and legislative requirements. Safe handling equipment should be available in the areas where chemicals are used.		
3.7.7 Material Safety Data Sheets (MSDS) should be available and posted in chemical storage areas and communicated to employees who use chemicals. The MSDS or safety instructions on the chemicals should be available in languages workers understand.		
3.7.8 Appropriate and operable personal protective equipment as recommended by the Global Harmonisation System (or equivalent) Safety Data Sheets should be provided in all areas where chemicals are stored and used.		
3.7.9 Spill kit or absorbents should be available in chemical storage areas.		
3.7.10 In the chemical storage area, secondary containment equivalent to at least 110% volume of the largest container should be provided in case of chemical leakage.		
3.7.11 Personal exposure should be monitored and kept below legislative requirements.		
3.7.12 Eye wash facilities should be provided where chemicals are used, such as laundry process and hand-spray process, and anywhere there is a risk of splashes to the eye.		
<b>Sum of 'No'</b>		

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## 12.0 APPENDIX 6

### BURBERRY PARTNER PROGRESS TOOL FACILITY DEFINITIONS

		Type of Partner	Explanation	Examples
Partner type	A	Vendor/Converter – chemical usage	<p><b>Vendor:</b> Refers to a final or finished product manufacturing and assembling business entity that makes a final or finished product for selling to the consumer marketplace through a brand or retailer.</p> <p>Chemical Usage refers to vendors who have either:</p> <ul style="list-style-type: none"> <li>– Fully integrated vertical operations</li> <li>– Partially integrated operations (e.g. laundry, garment dye, etc.)</li> </ul> <p><b>Converter:</b> A company that purchases semi-processed materials (or greige material) and transforms them into a finished material and has some of its own wet processes and some outsourced wet processes.</p>	<p>Facilities with the following operations:</p> <ul style="list-style-type: none"> <li>• Cut, make and trim (CMT)</li> <li>• Final product assembly</li> <li>• Wet processing such as garment dyeing, laundry, printing, dyeing, finishing, tanning, etc.</li> </ul>
	B	Vendor/Converter/Agent/Supplier – not using chemicals internally	<p><b>Vendor:</b> Refers to a final or finished product manufacturing and assembling business entity that makes a final or finished product for selling to the consumer marketplace through a brand or retailer. Low-impact chemical usage should be considered in this category.</p> <p><b>Converter:</b> A company that purchases semi-processed materials (or greige material) and transforms them into a finished material through outsourced wet processes.</p> <p><b>Agent:</b> A company that acts on behalf of another company, representing them to the brand/retailer, perhaps in another country.</p> <p><b>Supplier:</b> Refers to a raw material processing business entity that provides raw material such as woven or knitted fabrics or yarns (or greige material) or untreated hide, which is then used by wet-processing facilities/suppliers in the production of the final material. Incoming raw materials and internal manufacturing must not include wet processing.</p>	<p>Vendor facilities with the following operations:</p> <ul style="list-style-type: none"> <li>• Cut, make and trim (CMT)</li> <li>• Final product assembly</li> <li>• No wet processing such as laundry, printing, dyeing, finishing, tanning, etc.</li> </ul> <p>Supplier facilities with the following operations:</p> <ul style="list-style-type: none"> <li>• Raw hides</li> <li>• Raw polymers</li> <li>• Fibre manufacturing</li> <li>• Spinning of greige fibres</li> <li>• Weaving of greige yarns</li> <li>• Knitting of greige yarns</li> <li>• Trims and accessories</li> </ul>
	C	Supplier – using chemicals internally and procuring wet-processed materials	A company that performs wet processes on raw materials and purchases wet-processed materials and/or subcontracts some wet processes.	<p>Facilities performing one or more of the following processes:</p> <ul style="list-style-type: none"> <li>• Dyeing</li> <li>• Garment washing and dyeing</li> <li>• Printing</li> <li>• Fabrics and leather coating</li> <li>• Tanning and re-tanning</li> <li>• Fabric/leather finishing</li> <li>• Spinner that procures dyed fibres</li> <li>• Procuring wet-processed raw materials</li> </ul>
	D	Supplier – using chemicals internally and processing raw materials that have not been wet processed/suppliers that perform wet processes on commission	<p><b>Commission:</b> A company that is assigned to perform a process for another company and has no control over the procurement of incoming material, e.g. a dye house that receives ecru yarn from a weaving mill, dyes the yarn and sends the yarn back to the weaving mill.</p> <p><b>Beam house:</b> A company that tans raw/salted hides.</p> <p><b>Fibre:</b> A company that wet-processes untreated raw materials.</p> <p><b>Polymer:</b> A company that transforms synthetic raw material into filaments, staple fibres, films or coatings.</p>	<p>Examples:</p> <ul style="list-style-type: none"> <li>• Wool scouring</li> <li>• Commission dyeing/printing</li> <li>• Beam house</li> <li>• Top fibres dyeing</li> </ul>