

Sustainable Chemical Management Policy

PURPOSE

Ralph Lauren Corporation, its affiliates and subsidiaries (collectively, “RLC” or the “Company”) is committed to creating products that are timeless and lasting while reducing their environmental impact. As part of that commitment, sustainable chemical management is a priority in the Company’s global quality assurance program, as well as its global citizenship and sustainability [Timeless by Design](#) initiative. The purpose of this policy is to set forth the expectations on chemicals selection and processing, and on monitoring and reducing the environmental, health and safety risks associated with the usage and output of hazardous chemicals through our product and manufacturing. RLC’s goal is to eliminate the use of hazardous chemicals in our product manufacturing by 2025 initiative. The purpose of this policy is to set forth the expectations on chemicals selection and processing, and on monitoring and reducing the environmental, health and safety risks associated with the usage and output of hazardous chemicals through our product and manufacturing. RLC’s goal is to eliminate the use of hazardous chemicals in our product manufacturing by 2025.

RESTRICTED SUBSTANCES LIST (RSL)

RLC’s product integrity is assessed at various stages of our operations through a robust Global Testing and Quality Assurance Program. RLC requires all materials, components and products supplied or used in the manufacture of RLC product to comply with applicable chemical content requirements and chemical laws of the country in which those products are manufactured and distributed. RLC adopts the [American Apparel and Footwear Association Restricted Substances List](#) (“AAFA RSL” or “RSL”), which sets forth specific chemical substances bans, limitations or test methods as specified by government or regulatory agencies. Accordingly, all RLC’s suppliers must acknowledge, warrant and agree to supply components and products that conform with, or exceed the requirements set forth in the AAFA RSL. The RSL is updated on a regular basis and may be supplemented with additional resources to assist RLC’s suppliers in understanding and complying with the Company’s expectations and requirements.

SCOPE

The RSL is applicable to all fabrics, trims or related materials, apparel, accessories, footwear, home textiles, and components that are supplied or sold to the Company for use in the manufacture or distribution of any RLC product.

MANUFACTURING RESTRICTED SUBSTANCES LIST (MRSL)

RLC believes a broader industry collaboration is required to achieve a widespread implementation of Sustainable Chemicals Management across the supply chain. In FY20, RLC established a partnership with the [Zero Discharge of Hazardous Chemicals](#) (“ZDHC”) and committed to the adoption of the ZDHC standards and tools to guide the way RLC’s supply chain selects, purchases, and manages chemicals. RLC adopts the ZDHC MRSL, a harmonized list of hazardous chemical substances banned from intentional

use in the manufacturing and processing of textile, apparel, and footwear products. Suppliers and each facility utilized or engaged in manufacture of RLC products are expected to create and implement an effective chemical selection and procurement process to ensure all chemicals entering the facilities conform with [ZDHC MRSL](#) and the AAFA RSL requirements. The Company also requires its suppliers and facilities to:

- i. Regularly screen each chemical purchased against the most up to date ZDHC MRSL and AAFA RSL standards;
- ii. Implement a phase-out plan for any non-conformant chemical; and
- iii. Set goals to replace non-conformant chemicals with more sustainable alternatives that are compliant with the ZDHC MRSL by 2025.

SCOPE

The MRSL is applicable to all suppliers with wet processing onsite, including but not limited to washing/laundry, printing, dyeing, coating/lamination, spraying, binding, and other types of wet and/or chemical finishing that are associated with the manufacture of RLC products.

CHEMICAL INVENTORY TRANSPARENCY AND TRACEABILITY

As we work towards our 2025 goal to eliminate the use of hazardous chemicals in our supply chain, RLC also aims to achieve full transparency of the chemicals used in the production of our products. Establishing visibility and transparency of chemicals used in production is necessary to understand the conformance status of the chemicals against our standards. For this purpose, we utilize the ZDHC methodology and tools for chemical inventory list (CIL) management to help facilities screen, track, and directly report the conformance levels of chemicals used in production against the ZDHC MRSL. Facilities are expected to comply with the following:

- Maintain a complete and up to date chemical inventory;
- Be able to demonstrate that all the chemical used in the manufacturing process can be traced back to chemical inventory; and
- Provide full visibility of chemicals used in RLC production through the ZDHC-approved CIL management tool, with direct connectivity with RLC’s account.

FACILITY WASTEWATER QUALITY STANDARD

RLC expects all suppliers and facilities to properly manage and treat wastewater and sludge to meet or exceed legal requirements. Furthermore, the Company adopts the [ZDHC Wastewater Guidelines](#), a standardized wastewater sampling, testing, and reporting tool for the apparel and footwear industry. The ZDHC wastewater test methodology is aimed at confirming whether any non-conformant chemicals are intentionally used in the manufacturing process. In case any non-conformity to the Guidelines is found in the test result, we expect the facility to perform a root cause analysis (“ROA”) and corrective action, to remediate issues found and implement processes to prevent recurrence. RLC expects all suppliers and facilities with industrial water use to complete the ZDHC wastewater test at least once a year, and upload their test reports on the [ZDHC Gateway - Wastewater Module](#).

SUSTAINABLE CHEMICAL MANAGEMENT PRACTICES IN MANUFACTURING PROCESS AT FACILITY LEVEL

RLC utilizes the [ZDHC Chemical Management System \(CMS\) Framework](#) and expects the Company's suppliers and facilities to comply with the standard practices set out in the framework. This includes the Company's adoption of the [Higg Index Facility Environmental Module \(FEM\)](#) developed by [Sustainable Apparel Coalition \(SAC\)](#) as primary tool to measure and benchmark the chemicals management practices at each facility. RLC expects all suppliers and facilities to respond to the Higg Index FEM with third party verification. The performance data self-reported by our suppliers and verified by SAC-accredited verification body will enable RLC to evaluate the effectiveness of the chemical management system onsite and invest in support mechanism to facilitate meaningful improvements, which in turn will lead to safer and more sustainable chemical management practices. The Higg Index FEM [Chemical Management](#) section covers the following focus areas, aligned with the ZDHC CMS Framework:

- Chemical management policies, compliance procedures, and commitments
- Chemical selection and procurement practices
- Chemical and product traceability, quality and integrity
- Chemical storage and handling, transportation, usage/operations, general maintenance, housekeeping, and proper disposal practices
- Chemical inventory management and ZDHC MRSL monitoring framework, documentation and record control practices
- Health and Safety management, Emergency Response Plan (ERP), incidents management and remediation plan
- Employee training and communication, with topics including chemical hazard and risks of exposure, safety measures, chemical handling and operational know-how, wastewater treatment techniques, proper chemical waste disposal procedures, etc.
- Chemicals substitution to safer alternatives and process innovation

THE ELIMINATION OF PER- AND POLYFLUOROALKYL SUBSTANCES (PFAS)

RLC is committed to the elimination of Perfluorocarbons (PFCs), otherwise known as Per-and Polyfluoroalkyl Substances (PFASs), a chemical substance group that includes PFOA, PFOS and other per- and polyfluorinated chemicals. RLC began phasing out the use of PFASs from product and material in FY20. PFASs are commonly used in the material treatment to achieve water resistance or repellency performance. If not managed correctly in production process, PFASs could be released to the environment through the effluent discharge from the manufacturing facility, as well as through the product usage and end-of-life disposal and may lead to adverse impacts on people and the environment.

FOOTNOTES

1. PVC applications include, but not limited to plastisol-based screen prints, plastic-based material or components in accessory and footwear, coating on synthetic leather and textiles, packaging materials, etc.
2. There are more than ten toxic, restricted substances in RLC Testing Manual that are associated with PVC production and disposal, including Phthalates, Heavy Metals such as Lead and Cadmium, Polycyclic Aromatic Hydrocarbons (PAHs), Short Chain Chlorinated Paraffin (SCCP), Vinyl Chloride Monomer (VCM), Dimethylformamide (DMFA), Pentachlorophenol (PCP), Bisphenol-A (BPA) and Other Volatile Substances.

In order to eliminate the use of PFASs from all RLC product with water resistance or repellency functionality, RLC established a standardized chemical management procedure and PFASs testing requirement across all RLC brands. RLC's suppliers, licensees, and facilities are expected to comply with the following:

- The chemicals used to manufacture water resistance or repellency material must be certified PFASs-free;
- The manufacturing facility must ensure traceability of all chemicals used and processes involved in the water resistance or repellency material production;
- The material manufactured must pass PFASs testing as defined in RLC Testing Manuals to demonstrate the material is free of any traces of PFASs.

In FY23, all RLC product with water resistance or repellency functionality have transitioned out of PFASs. All new and existing suppliers manufacturing water resistance and repellency materials must meet the above-described chemical management procedure. PFASs testing has been incorporated into the RLC Testing Manual for continuous monitoring to ensure the product compliance to RLC RSL standard.

THE ELIMINATION OF POTASSIUM PERMANGANATE (PP)

Potassium Permanganate (PP) is a strong oxidizing agent used to make color fading effect on denim and other apparel products. A proper ventilation system and protective equipment are necessary in the workplace when applying the chemical to the fabric. In line with our operating standard and sustainable denim initiative, we are committed to eliminating the use of PP spray across our denim and non-denim products. We are on track to phase out all Potassium Permanganate from denim by 2025, and plan to expand this to non-denim products.

THE ELIMINATION OF POLYVINYL CHLORIDE (PVC)

Polyvinyl chloride, commonly referred to as "PVC" or "vinyl" is one of the most widely used types of plastics worldwide. PVC has a wide range of applications¹ in our industry. The production, use, and disposal of PVC have inherent environmental and health hazards throughout its life cycle. Eliminating the use of PVC is an important step in ensuring our product's safety and regulatory compliance², as well as minimizing the environmental and health risks from the manufacturing process.

RLC commits to no longer design and develop products with PVC materials. Raw Material and Finished goods suppliers and licensee partners are expected to ensure all materials developed and used in RLC products do not contain PVC. Additionally, PVC has been incorporated into the RLC Testing Manual to verify compliance with RLC standards.