

Superdry & Co

CHEMICAL MANAGEMENT POLICY 2026

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 noncompliance 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.

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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/>

Please download it and share with all key stakeholders in your organisation and supply chain partners along with Superdry's 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) Per- & Polyfluoroalkyl Substances (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 and test according to the appropriate test method.

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. It is your responsibility, as our supply to provide to us, within a short time frame, the Root Cause Analysis and Corrective Action Plan which you must then implement to ensure the required improvements are made in your supply chain.
- We will discuss your findings with you and agree on the next steps required to ensure compliance.
- 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.

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- 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(s) in your organisation responsible for chemical management goes through these training modules.

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 all chemical restrictions.

SUPERDRY ZDHC POLICY

Superdry is 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 actively engaged with the [ZDHC Roadmap to Zero \(RtZ\) Programme](#) and progress toward targets to prevent hazardous chemical use and pollution in the upstream supply chain.

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

It is your responsibility to ensure your supply chain base, who are in ZDHC scope (such as your wash houses, printers and fabric mills), are part of Superdry ZDHC RtZ Programme and adhere to the requirements set within it. You need to monitor their engagement and progress and ensure they comply.

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 InCheck 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.

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Superdry supply chain ZDHC Requirements:

- Register to [ZDHC Gateway](#)
- Connect with Superdry on the **ZDHC Gateway** portal
- Be part of the [ZDHC StZ \(Supplier to Zero\) Programme](#)
- Implement a **CMS (Chemical Management System)**
- Adopt the [ZDHC Framework](#)
- Commit to implementation [ZDHC MRSL \(Manufacturing Restricted Substance list\)](#)
- Comply with [Superdry Wastewater Policy](#)
- Commit to implementation of [ZDHC Wastewater Guidelines](#)
- Maintain a **Chemical Inventory List (CIL)** (see core requirements)
- Provide **ZDHC Performance InCheck** reports
- Progress to **ZDHC Verified InCheck**
- Provide **ZDHC Clearstream Wastewater** reports, meeting at minimum Level 1 limits
- Progress in conformance level to the **ZDHC MRSL and WWG Guidelines**
- Progress through the [StZ Levels](#), in-scope suppliers and supply chain partners are required to achieve Level 1, Level 2 and then Level 3 certification
- Action **Capacity Building** [\(engage with ZDHC Academy and endorsed training schemes\)](#)
- Commit to implementation of [MMCF ZDHC Guidelines](#), complete **MMCF module** where applicable
- Provide a comprehensive **Root Cause Analysis** and **Corrective Action Plan** on any found non-conformities in your supply chain (see core requirements)
- **Cascade all requirements to your Superdry supply chain partners** and, where they are in-scope, bring them onto the same ZDHC Roadmap to Zero Programme, monitor their results and ensure they progress in compliance.

Chemical Procurement

Suppliers must ensure they and their Superdry supply chain partners adopt a chemical procurement policy to ensure only ZDHC MRSL conformant chemicals are used that are in alignment with, at minimum, Level 1 ZDHC MRSL conformant chemicals and that progress is continually made to obtain chemicals with higher levels of MRSL conformance.

Suppliers are required to substitute chemical products, that are found to be non-conformant to the ZDHC MRSL, with chemical products meeting at least ZDHC MRSL Level 1 conformance.

Chemical Inventory List (CIL) – Core Requirements

All Superdry supplier and supply chain partners, who hold a chemical inventory, must maintain a CIL to ensure that you are able to trace and documents all input chemicals across manufacturing to ensure regulatory global compliance and alignment with the policies of the ZDHC MRSL. These systems mitigate risk by ensuring that banned or hazardous substances never enter the supply chain.

To successfully maintain a Chemical Inventory List (CIL), suppliers must meet several core criteria:

1. Essential Data Tracking

Suppliers must record highly specific, line-item details for every chemical formulation used in production, washing, printing, and facility maintenance. Required data points typically include:

- **Product Trade Name & Supplier/Manufacturer details.**
- **Intended Use** (e.g., dyeing, finishing, cleaning).
- **Safety Data Sheets (SDS):** Must be readily available, up-to-date, and accessible in local languages.
- **Hazard Classifications:** Clear documentation of health and environmental risks.

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- **Volume/Consumption:** Accurate tracking of chemical amounts procured, stored, and used.

2. MRSL & RSL Compliance

All chemicals in the inventory must conform to the ZDHC Manufacture Restricted Substances List (MRSL) and the Superdry RSL, which is aligned to the AFIRM RSL.

- **Input Management:** Suppliers must only purchase chemicals from suppliers that can verify that formulations do not contain banned substances.

3. ZDHC InCheck Verification

Superdry requires transparency and verification through the ZDHC InCheck reporting process.

- **Database Uploads:** CILs should be updated monthly, digitized and registered onto ZDHC Gateway to track MRSL conformance levels.
- **Verification Reports:** Suppliers are required to generate regular Performance InCheck reports to evaluate the overall compliance of their active chemical inventory and progress to providing Verified InCheck reports.

4. Continuous Maintenance & Audits

Inventory management is an ongoing obligation rather than a one-time audit.

- **Updates:** The CIL must be reviewed and updated regularly whenever new chemicals are procured or formulations change.
- **Purchasing Policy:** Suppliers are usually required to possess a formalized, written chemical purchasing policy that reflects the brand's requirements.
- **Facility Inspections:** Physical storage and handling (proper labeling, secondary containment, ventilation) may be subject to periodic third-party audits.

RCA (Root Cause Analysis) and CAP (Corrective Action Plan) – Core Requirements

Should suppliers encounter non-compliance to our RSL or MRSL requirements then a formal, clearly documented, RCA and CAP are required to be submitted to Superdry, within agreed time frames, this should identify the underlying reasons for a the failure and outline immediate fixes and systemic changes to prevent recurrence. Guidance as below:

- **Define the Problem**
Clearly identify and document the specific non-compliance (e.g., restricted chemical detected above allowable limits). Avoid premature assumptions and write a clear problem statement detailing what the issue is, when it was found, and its impact.
- **Gather Data**
Collect objective evidence surrounding the incident. This includes reviewing batch records, testing results, supplier documentation, standard operating procedures (SOPs), and interviewing personnel involved.
- **Identify Possible Causes**
Use brainstorming sessions and analytical methods to map out potential causes.
- **Determine the Root Cause**
Filter out the symptoms to isolate the fundamental, systemic issue.

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- **Develop and Monitor Corrective Actions**

Implement Corrective and Preventive Actions (CAPA) directly targeted at the root cause and formally monitor the process over time to verify the non-compliance does not recur.

Please note if non-compliance to the ZDHC MRS L is found in ClearStream reporting then the specific ZDHC RCA and CAP process must be followed as detailed in the ZDHC Wastewater Guidelines and as outlined in the Superdry Wastewater Policy document.

Superdry's Chemical Compliance Support Team & Monitoring Progress

Superdry's Chemical Compliance Team and Chemical Compliance Champions, in our regional offices, are on hand to advise and support suppliers, please contact us if you have any queries. We monitor supplier ZDHC engagement to ensure suppliers meet the requirements on adopting the ZDHC guidelines, platforms and solutions and on progress towards targets to prevent hazardous chemical use and pollution in the supply chain. We will also follow up with you on any non-conformities found in our supply chain so required improvements are made to ensure compliance.

We regularly provide supplier presentations on ZDHC requirements and updates, our Superdry Roadmap to Zero and our yearly objectives and progress to be able to achieve our 2030 targets. Please do attend!

Roadmap to Zero Objectives

We have established a **Superdry ZDHC Roadmap to 2030**, which is shared with all of our suppliers, to eliminate hazardous chemicals throughout our supply chain by promoting sustainable chemistry and our chemical compliance requirements. This is shared with all suppliers se. 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.

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/>

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This includes the:

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

Please note ZDHC requirements and documentation are regularly being updated and it is a supplier requirement to proactively stay updated and there is further documentation relating to ZDHC which suppliers are fully responsible for accessing, understanding and implementing.