

# Rapha Down Sourcing Policy

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Version: 3

Date: 20th December 2023

## Scope

This policy applies to all down feather products produced by Rapha, and covers the social, labour and environmental risks present in Tiers 1-4 of the down supply chain.

Supply chain Tiers are defined as follows:

Tier 4 - raw material origin

Tier 3 - raw material processing and suppliers of components to Tier 2 materials

Tier 2 - materials suppliers (fabric mills, trim manufacturers)

Tier 1 - finished garment manufacturers

## Background

Since the launch of our first insulated down jacket in 2018, down has been a key material for Rapha. While there are synthetic versions of insulation available, we are yet to find an alternative solution which rivals the warmth to weight ratio and extremely low pack volume of down. It therefore remains an important insulation technology for Rapha.

Down is most often a by-product of the duck and goose food industry. The main point of concern when sourcing down is animal welfare – ensuring that there is no force-feeding of the animals and that there is no live plucking. In general, it is very important to ensure that the animals haven't been subjected to any unnecessary harm.

## Policy Fundamentals

- 1. Rapha requires that all down is RDS certified**
- 2. Impacts at farming and processing stages**
- 3. Supply Chain Traceability**
- 4. Sourcing country**

## **1. Rapha requires that all down is RDS certified**

To address the animal welfare challenges related to down production, Rapha is committed to sourcing only down that is certified to the Responsible Down Standard (RDS). We have only ever used RDS certified down, and will continue to do so in future by working with all suppliers across Tiers 1-4.

## **2. Reduce the impacts at farming and processing stages**

### **Impacts of down farming at Tier 4**

The Responsible Down Standard requires that down comes from birds that are not subjected to live-plucking or force-feeding, and that the animals are not subjected to any unnecessary harm, as set out in the [Five Freedoms](#) of animal welfare below:

1. Freedom from hunger or thirst
2. Freedom from discomfort
3. Freedom from pain, injury or disease
4. Freedom to express most normal behaviour
5. Freedom from fear and distress

### **Impacts of down processing**

In regards to the processing of down, Rapha requires its Tier 1 and 2 suppliers to comply with the UK and [EU REACH](#) legislation to ensure that no hazardous or restricted substances are present in finished goods. In addition to this, we require Tier 1 and 2 suppliers to measure their chemical management performance through the [Higg Index FEM](#). This ensures that hazardous and restricted substances are not used during manufacturing and that water and waste management processes are monitored through adherence to the [ZDHC MRSL](#).

## **3. Supply chain traceability**

Supply chain traceability is necessary to prevent, record and remedy animal welfare risks in the down supply chain. Due to the complexity of the down supply chain, traceability to farm level is difficult. RDS uses the segregation chain of custody model - which ensures that down is segregated at each stage of the supply chain, thereby ensuring traceability after farm level. At farm level, additional documentation is guaranteed to verify the country of origin.

## 4. Sourcing country

Rapha currently sources down from multiple European countries, which are combined in Hungary. There are risks assigned to down production in Hungary, including live plucking and harvesting foie gras. However, we can confirm no live plucking occurs from [Allied](#) sources, our trusted and only down supplier. We are also developing products with Allied down sourced from China to near shore with our factories, reducing our carbon footprint which we expect to be used in Rapha production in the next few years.

Since 2008, Allied has been leading the way in animal welfare for down production by becoming the first down supplier to require certification. [Track My Down](#) is an online tool which can be used to verify certification by tracing any batch of down using a unique product lot number. In 2014, Allied also became a founding member of the RDS (Responsible Down Standard).

## Holding ourselves accountable by publishing our commitments

To ensure the fundamentals of our down sourcing policy are upheld, we have published, in full, our own impact commitments and those of our suppliers so that people within and outside Rapha can hold us to account.

### Rapha commitments

1. Rapha commits to nominating all down and feather suppliers where possible at Tier 2 level. This allows us visibility of our down and feathers suppliers, and allows us to build strong relationships. These relationships foster trust and cooperation that are necessary to tackle the complex nature of tracing down.
2. Rapha may audit our suppliers' compliance with this policy through the use of 3rd party auditors at any stage.

### Supplier commitments

1. **Sustainability certifications**  
Rapha requires RDS scope certificates for all Tier 2 facilities at the onboarding process, and subsequently when each certificate expires. Where applicable, we require RDS transaction certificates to be supplied at purchase order level by our Tier 1 suppliers, who will acquire these from Tier 2 suppliers if not supplied by Tier 1. Tier 2 suppliers are responsible for gathering transaction certificates from

Tiers 3 and 4. Rapha commits to forecasting the need for RDS certificates at fabric shipment level on forecasts to Tier 2 suppliers.

**2. Material type and composition**

We expect our suppliers to always be able to provide us with a Commercial and Technical Sheet of the specified down product, including any information related to hygiene and performance testing.

**3. Manufacturing processes**

Rapha requires all Tier 1 and 2 suppliers to report on manufacturing processes via the Higg Index FEM annually. Suppliers are also required to commit to adopting the Higg Index FEM and FSLM tools to monitor environmental, social and labour compliance at Tier 1-2 level.

**4. Material Traceability**

Rapha requires its suppliers at Tier 1 (where using local source) and 2 level to trace and disclose all partners and facilities in its down and feathers supply chain down to Tier 4 level, including farming, sorting, cleaning, de-dusting, finishing and manufacturing.

We require all Tier 1 (where using local source) and Tier 2 suppliers to maintain documentation proving the disclosure process outlined above for the down supply chain used up to Tier 4 level. This may take the form of RDS transaction certificates for each stage of the supply chain. Documentation must show the name and address of each facility. Supporting documentation such as invoices may be provided as supplementary evidence. Rapha may request this information at any time and expects suppliers to maintain records for five years.

## **Mutual commitments**

Both Rapha and our Tier 1 and 2 suppliers commit to upholding this policy.

### **Non-compliance procedure**

In the case of a breach of Rapha policy, we will always strive to rectify the situation with the stakeholder through remedial action. It is our duty to maintain business relationships where it is possible to effect positive change. Undue termination of contract does not solve problems, it merely pushes them onto other organisations.

We would resort to termination of contract under the following circumstances:

- If, after repeated attempts at remedial action, it is not impossible for an improvement to be made

- If the stakeholder shows no willingness to improve
- If it is not possible to undertake remedial action for reasons beyond our control (e.g. Rapha is prohibited access to information or verification by an organisation with significant power such as a national government.)

## **How we communicate our policy**

Rapha commits to circulating this policy and training all internal teams involved in the sourcing and use of down and feathers. We also commit to circulating this policy to all Tier 1 and 2 suppliers, from whom we expect assurance of compliance.

This policy will also be hosted publicly on Rapha's website to make our position clear to all our stakeholders and to hold ourselves accountable to upholding these standards.

It is our duty to update and evolve policies over time. We commit to reviewing this policy annually, and on an ad-hoc basis when significant developments occur. Our Supply Chain, Sustainability and Materials Teams commit to ongoing due diligence on down sourcing. This includes monitoring the industry for any new developments, such as traceability technology.