Rapha Synthetics Sourcing Policy

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Scope

This policy applies to all synthetic fibres used in the production of Rapha materials derived from petroleum (fossil fuels). These include polyester, polyamide (nylon) and elastane (spandex). The policy covers the social, labour and environmental sourcing risks present in the polyester, polyamide and elastane supply chain, from Tier 1 to 4.

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, materials manufacturers)
- Tier 1 finished garment manufacturers

Background

Synthetic materials possess many enhanced performance benefits which can be engineered to the requirements of a cyclist. Properties include being lightweight, durable, easy to care for, fast wicking and quick drying. Because of these beneficial properties, many Rapha products are made using synthetic materials – polyester and nylon are our two most used materials by weight. However, as virgin synthetics are derived from petroleum, a non-renewable resource, they are inescapably linked to climate change.

Policy Fundamentals

1. Rapha strongly encourages all polyester, polyamide & elastane to be GRS certified by 2025

- 2. Impacts at extrusion and spinning stages
- 3. Supply Chain Traceability

1. Rapha strongly encourages all polyester, polyamide & elastane to be GRS certified by 2025

We strongly encourage our raw materials suppliers across every Tier (1-4) to source and produce, where possible, recycled synthetic materials rather than relying on virgin polyester, polyamide and elastane. Our aim is to ensure that, by 2025, all our polyester, polyamide and elastane is GRS (Global Recycled Standard) certified at fabric level with a minimum recycled content of 50%. Where certification at the fabric level is not possible, we will also accept GRS certification at raw material or yarn level with a minimum recycled content of 50%. We will accept both mechanical and chemical recycling methods so long as they are GRS certified. The Global Recycled Standard (GRS) is a voluntary standard created by <u>Textile</u> <u>Exchange</u> that applies internationally for recycled materials.

Bio-synthetics with the highest possible proportion of bio-content are also considered a potential solution to fossil-based virgin synthetics when recycling is not possible. We are currently working on the end-of-life aspect in order to be able to assess the impacts of these alternatives.

2. Impacts at extrusion and spinning stages

Rapha requires its Tier 1 and 2 suppliers to comply with the <u>EU REACH</u> 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 <u>Higg Index FEM</u>. 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 <u>ZDHC MRSL</u>.

One of Global Recycled Standard's primary goals is to reduce the chemical impacts of production, which is also supported by the third-party certification system that GRS puts in place to check that all the chemical restrictions for people and environment are met.

3. Supply chain traceability

Supply chain traceability is necessary to prevent, record and remedy environmental risks in the polyester, polyamide and elastane supply chain. GRS uses the segregation chain of custody model which ensures that polyester, polyamide and elastane are segregated at each stage of the supply chain, thereby guaranteeing traceability of the fibre's country of origin.

GRS certification guarantees by proxy that no forced labour has been used at any level. Global Recycled Standard social requirements are based on the principles of the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, guaranteeing that good working conditions are upheld.

Holding ourselves accountable by publishing our commitments

Rapha commitments

- 1. Rapha commits to nominating all polyester, polyamide and elastane suppliers at Tier 2 level. This allows us visibility of our polyester, polyamide and elastane fabric suppliers, and allows us to build strong relationships. These relationships foster trust and cooperation that are necessary to tackle the complex nature of tracing polyester, polyamide and elastane.
- 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 GRS scope certificates for all Tier 2 facilities at the onboarding process, and subsequently when each certificate expires. Where applicable, we require GRS 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 GRS certificates at fabric shipment level on forecasts to Tier 2 suppliers.

2. Material type and composition

We expect our suppliers to be able to provide us with a Commercial and Technical Sheet of any material at any time. This includes information relating to the fibre specifications as well as performance testing. Suppliers are welcome to share any life cycle analysis that they might have conducted on the environmentally preferred material used in order to scientifically support the benefits of its use compared to the conventional equivalent.

Suppliers are required to move to recycled/bio-synthetic solutions only when able to deliver virgin-equivalent fabric quality. We also request that our suppliers stay up-to-date on various test methods for microfibre shedding.

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 encourages its suppliers at Tier 1 (where local source is used) and Tier 2 level to trace and disclose all partners and facilities in its polyester, polyamide and elastane supply chain to Tier 4 level. This includes extrusion, spinning, weaving or knitting and dyeing and finishing.

We require all Tier 1 local source and Tier 2 suppliers to maintain documentation proving the disclosure process outlined above for the polyester, polyamide and elastane supply chains used, up to Tier 4 level. This may take the form of GRS 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 synthetics. 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 synthetics sourcing. This includes monitoring the industry for any new developments, such as traceability technology.