

Rapha Cotton Sourcing Policy

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Scope

This policy applies to all Rapha cotton and cotton blend materials and trims, used in Rapha production.

The policy covers the social, labour and environmental risks present in the cotton supply chain tiers 1 to 4 of the 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 Rapha's Logo range was first introduced in AW19, Cotton has become a large part of our lifestyle sourcing strategy. It has, therefore, been necessary to turn our attention to the environmental and social risks involved in Cotton supply chains and ensure we are supporting ethical practice.

Cotton is the most widely used natural fibre in textiles accounting for just under one quarter (22%) of total fibres manufactured worldwide. Globally, cotton is grown in 80 countries on 33 million hectares (around 2.2% of global arable land) and the majority of it is grown with the use of vast quantities of pesticides and fertilisers. The water-intensive usage for its cultivation compounds the environmental and human health impacts of the synthetic chemical use. Cotton is the highest ranking globally-traded product at risk of being produced using modern-slavery, therefore risk assessment at sourcing country level is required.

The typical cotton supply chain is complex, and often involves multiple facilities from farm to ginning, pressing, spinning, weaving or knitting and dyeing. Cotton is often traded multiple times and agents may be used at each stage. This can make tracing cotton from finished garment back to its original source, and therefore the enforcement of environmental and social and labour standards at each stage, challenging. To counter this, there are multiple

traceability models available to solve this problem, with varying levels of complexity and cost.

Policy Fundamentals

- 1. Rapha requires all cotton to be organic or in-conversion**
- 2. Impacts at farming and processing stages**
- 3. Supply Chain Traceability**
- 4. Prohibited sourcing countries**

1. Rapha requires all cotton to be organic or in-conversion

To address the aforementioned environmental and social challenges, Rapha has been committed to source only organic cotton since 2023 and from 2023 onward, we also accept in-conversion cotton. When a farmer stops using pesticides, it takes two years for land to qualify as organic. During this period it can be hard for farmers to sustain operating costs because of reduced yields, to support these farmers and positive change we can accept cotton which is converting to organic.

Rapha will work with its suppliers to meet our requirement for all cotton across every Tier (4-1) to be organic. We endeavour to source OCS (Organic Cotton Standard) or GOTS (Global Organic Textile Standard) certified cotton at fabric level. When this is not possible, we also accept certification at fibre or yarn level. We can accept any CCS (Content Claims Standard) that is endorsed by Textile Exchange but GOTS and OCS are preferred, please see acceptable standards below:

<https://textileexchange.org/pfmm/>

2. Reduce the impacts at farming and processing stages

Impacts of cotton fibre farming at Tier 4

According to Textile Exchange LCA of Organic Cotton Fiber, organically grown cotton has the following potential impact savings (per 1,000kg Cotton Fiber) over conventional: 46 percent reduced global warming potential, 70 percent reduced acidification potential, 26 percent reduced eutrophication potential (soil erosion), 91 percent reduced blue water consumption and 62 percent reduced primary energy demand (non-renewable).

Impacts of cotton processing

During processing, we encourage our suppliers to reduce the environmental and health impacts of synthetic chemicals as well as make an efficient and responsible use of water and energy. CCS certification guarantees that harmful environmental and chemical impacts are minimised.

Rapha requires its Tier 1 and 2 suppliers to comply with the AFIRM Restricted Substance Lists; we confirm compliance at mill level by Bluesign or Oeko-tex scope certification. In addition to this, we require Tier 1 and 2 suppliers to measure their chemical management performance through the [Higg FEM](#). This ensures that hazardous and restricted substances are not used during manufacturing through adherence to the RSL, and the monitoring of water and waste treatment processes.

3. Supply Chain Traceability

Supply chain traceability is necessary to prevent, record and remedy social and labour risks in the cotton supply chain. Due to the complexity of the cotton supply chain, traceability to farm level is difficult. Content Claims Standards like GOTS and OCS use the segregation chain of custody model - which ensures that cotton is segregated at each stage of the supply chain and guarantees traceability after farm level. At farm level, additional documentation is required to verify the country of origin. Any cotton, if covered by Content Claims Standards from ginning onwards, must be certified organic, therefore any cotton that has Textile Exchange approved Content Claims Standard (CCS) certification guarantees by proxy that no forced labour has been used at farm level.

4. Prohibited Sourcing Countries

Rapha requires that no cotton shall be sourced from regions with human rights abuse within their cotton supply chains and / or lack of visibility to ensure the human rights are being upheld. This list is reviewed annually and currently includes:

XUAR, China - Rapha requires that no cotton shall be sourced from XUAR, China.

China is the world's [largest producer of cotton](#), with 80% of China's cotton [grown in the XUAR, accounting for 16-20% of global cotton](#).

It is currently widely reported, including by the [UK government](#), that Uyghurs and other Muslim minorities in the Xinjiang Uyghur Autonomous Region of China (XUAR) are subject to human rights violations, and forced labour and labour paid well below the minimum wage in the cotton industry. As there are significant challenges in accessing worker documentation and barriers to interviewing workers during audit processes in this region, we conclude that it is not possible to responsibly source from this region of China, as it is not currently possible to uphold our due diligence process. Our overarching principle is to work with suppliers to remedy any breach of our code of conduct including forced labour and wage issues, however we can not guarantee that any remedial action could be sufficiently verified in XUAR. Therefore Rapha requires that no cotton shall be sourced from XUAR, China.

Turkmenistan - Rapha requires no cotton shall be sourced from Turkmenistan.

Turkmenistan operates a government controlled cotton production system which leads to

forced and child labour in the cotton harvest. Public sector workers are required by law to pick cotton to fulfill the yearly quota. Workers often have to recruit their children to fulfill this quota. According to [the ETI](#), this system was still in place for the 2020 harvest, and there is no evidence that the Turkmen government is taking action to reduce levels of child and forced labour in the cotton production system. Therefore due to the risks of child and forced labour, Rapha requires no cotton shall be sourced from Turkmenistan.

Uzbekistan - Rapha requires that no cotton shall be sourced from Uzbekistan.

Uzbek cotton has until recently been widely boycotted due to widespread evidence of child and forced labour in the cotton farming industry brought about by the government annual quota system for cotton. In 2021 [the ILO newly recommended](#) the responsible sourcing of Uzbek cotton, following a review of government reforms that have led to a significant reduction in forced labour. Despite this progress, instances of forced labour have been reported in 2020, and the government continues to restrict free registration of human rights NGOs which inhibits the human rights due diligence process. We recognize that international investment in the Uzbek cotton industry will further support the reforms, therefore in the spirit of doing positive business we will continue to monitor the situation in Uzbek and review our stance accordingly. However, Rapha currently requires that no cotton shall be sourced from Uzbekistan.

Syria - Rapha requires that no cotton is sourced from Syria.

Following the outbreak of the Syrian war, it has been reported that in 2015 the terrorist group IS [gained control of Syria's cotton supply](#). The control of Syria's cotton growing regions has remained fluid in following years with varying levels of governmental control. Conflict is a marker of modern slavery - Syria is 38th on the [Walk Free Foundation's Global Slavery Index](#), and makes conducting human rights due diligence processes extremely difficult due to the restriction of movement and freedom of speech. Therefore Rapha requires that no cotton is sourced from Syria.

Disclosure of process and documentation commitments to ensure this policy is upheld

Rapha Commitments

1. Rapha commits to nominating all cotton suppliers where possible at tier 2 level. This allows us visibility of our cotton 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 cotton.
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 CCS scope certificates where available for all Tier 2 facilities at the onboarding process, and subsequently when each certificate expires. Rapha requires CCS transaction certificates where applicable to be supplied at purchase order level by our Tier 1 suppliers, who will acquire these from Tier 2 suppliers at point of bulk shipment for every production batch, 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 CCS certificates at fabric shipment level to Tier 2 suppliers.

2. Material type and composition

Rapha requires its Tier 2 nominated source and Tier 1 where using local source suppliers to provide a Commercial and Technical Sheet for the specific material/trim, which includes any information related to the fibre/yarn specifications as well as any performance test conducted.

3. Manufacturing processes

Rapha requires all Tier 1 and 2 suppliers to report on environmental and chemical management processes via the Higg Index FEM annually.

4. Material Traceability

Rapha requires its suppliers at Tier 1 (where using local source) and Tier 2 for nominated source to trace and disclose all partners and facilities in its cotton supply chain to tier 4 level, including farming, ginning, trading, pressing, spinning, knitting, weaving, dyeing and finishing.

We require these suppliers to maintain documentation of facility name and location. This may take the form of CCS transaction certificates for each stage of the supply chain, or purchase invoices. 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 a 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, and recognise that undue termination of contract does not solve problems, it merely pushes problems onto other organisations.

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

- If, after repeated attempts at remedial action, it is not possible 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 scope of control (for example Rapha is prohibited access to information or verification by an organisation with significant power such as a government, or during times of conflict where information flows are restricted or tampered with).

Communication & Governance

Rapha commits to circulating this policy and training all internal teams involved in the sourcing and use of cotton. We commit to circulating this policy to all Tier 1 and 2 suppliers and receiving their 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 as the situation changes. The Rapha Supply Chain Sustainability and R&D teams commit to ongoing due diligence on cotton sourcing to ensure the relevance of this policy, including a monitoring of the industry for any new developments such as traceability technology. We commit to reviewing this policy annually, and on an ad-hoc basis when significant developments occur.