

INDEX

I. INDEX	1
II. INTRODUCTION	2
III. SCOPE	2
IV. TEAMS AND RESPONSIBILITIES	2
V. PROCEDURE	3
Stage 1. Initial contact with a company eligible to join “The List”	3
Stage 2. Request of information from the company eligible to join “The List”	4
Stage 3. Technical audit at the facilities of the company eligible to join “The List”	4
Stage 4. Acceptance of an application from a company eligible to join “The List”	5
Stage 5. Notice of acceptance of a candidate to join “The List”	5
Stage 6. Notice of rejection of a candidate to join “The List”	5
Stage 7. Prioritization of companies previously accepted to join “The List”	6
Stage 8. Notice of prioritization of a company previously accepted to join “The List”	7
Stage 9. Improvements in the production of members of “The List”	7
Stage 10. Exclusion from “The List”	7
Stage 11. Request for voluntary striking off from “The List”	7
Stage 12. Updates of “The List”	8
Stage 13. Validity of “The List”	8
Stage 14. Re-assessment of members of “The List”	8

II. INTRODUCTION

Auxiliaries, dyestuffs and pigments selection is an important issue to comply with INDITEX’s product health standard “*Clear to Wear*” (CTW) and its “*Manufacturing Restricted Substances List*” (MRSL). For this reason, every mill working for INDITEX should take into account both documents before purchasing any chemical product.

To facilitate selection of auxiliaries, dyestuffs and pigments, INDITEX has developed “*The List*”, a register of chemicals used in the textile and leather manufacturing process from reputed and high technical skills suppliers and classified by their degree of compliance with CTW requirements.

Although the inclusion in “*The List*” is an open process for any company within the scope hereunder defined (see “*III. Scope*”), this document describes the different stages and criteria followed by INDITEX for both for the inclusion of companies into “*The List*” and for the update of the information regarding their chemicals.

However, the mills working for INDITEX may purchase dyestuffs, pigments and/or auxiliaries from suppliers not included in “*The List*” as long as they verify that such chemicals do not represent any risk for CTW compliance and are controlled according to INDITEX manufacturing code “*Ready To Manufacture*” (RTM).

III. SCOPE

Manufacturers of dyestuffs, pigments or auxiliaries used in the manufacturing processes of textiles and/or leather articles.

IV. TEAMS AND RESPONSIBILITIES

- **INDITEX’s technical committee:** with the following responsibilities, among others:
 - To select potential candidates eligible to join “*The List*”.
 - To manage the applications received to join “*The List*”.
 - To take final decisions regarding those companies that should be accepted or rejected from “*The List*” project.
 - To select among all the companies previously accepted in the project, those that should be prioritized in order to appear in the next edition of “*The List*”.

The technical committee is composed of:

- o Héctor Alonso, from INDITEX’s Corporate Social Responsibility (CSR) department.
 - o Alejandro Sarmiento, from INDITEX’s CSR department.
 - o F. Javier Sardina, professor of Organic Chemistry at the University of Santiago de Compostela (Spain).
 - o Luis Ponsá, former chairman of the Spanish Association of Chemists and Colorists.
- **Technical Advice S.L. (TA)**¹ company with the following responsibilities, among others:
 - o To receive and manage all samples of dyestuffs, pigments and auxiliaries sent by the companies participating in “The List”.
 - o To apply dyestuffs, pigments or auxiliaries in those cases where this step is necessary for their subsequent analysis.
 - o To send samples to analysis laboratories.
 - o To conduct, either by itself or with other third parties, technical audits of good manufacturing practices to all companies which requested their inclusion into “The List” and are within the scope of the project.
 - **INDITEX product health and safety teams** in charge of the following responsibilities, among others:
 - o To carry out the sampling of chemicals at the mills working for INDITEX direct suppliers² in order to verify the accuracy of the results published in “The List”.
 - o To conduct, either by themselves or with other third parties, technical audits of good manufacturing practices to all companies which requested their inclusion into “The List” and are within the scope of the project.

V. PROCEDURE

Stage 1. Initial contact with a company eligible to join “The List”

Initial contact with a company eligible to be included in “The List” may occur in two different ways:

- Spontaneous applications: sent by any chemical manufacturer of dyestuffs, pigments or auxiliaries within the scope previously described in section “III. Scope” by e-mail to the following address: thelist@inditex.com.
- Chemical manufacturers directly contacted by INDITEX: INDITEX may contact such manufacturers who meet the requirements under section “III. Scope” to present them “The List” and to know if they are interested in joining the project.

¹ INDITEX reserves its right to incorporate other external service providers to carry out the responsibilities currently assumed by TA.

² Yarn, fabric, leather or garment suppliers who have a direct commercial relationship with INDITEX.

Stage 2. Request of information from the company eligible to join “The List”

Once the application to join “The List” has been received or the candidate was directly contacted by INDITEX, some information will be requested via e-mail and with a maximum delivery time of 5 working days in order to know in detail its business model, its chemical products range and its commercial presence in the different INDITEX’s production “clusters”.³

As the information requested at this stage might be deemed to be confidential by the candidate eligible to join “The List” and since it will be taken into consideration to accept or reject an application, the following documents should be signed:

- Document supplied by the candidate to ensure the accuracy and veracity of the information provided to INDITEX.
- “Non Disclosure Agreement” (NDA) between both parties.

Stage 3. Technical audit at the facilities of the company eligible to join “The List”

Upon reception of the information requested, INDITEX’s technical committee will request that a technical audit of good manufacturing practices will be conducted at the main facilities of the company eligible to join “The List”.

Technical audits of good manufacturing practices will cover the assessment of the following issues, among others:

- Technical capabilities of the staff responsible of product health policies.
- Traceability of finished⁴ and partially finished,⁵ products and those purchased from other companies and directly marketed (non-manufactured products⁶).
- Availability of laboratories and analytical instrumentation in-house or in the external laboratory the company is working with.
- Mill production capacity.
- Product health policies followed for the internal control of raw materials, intermediate products and products marketed for the purposes of complying with international product health regulations as well as CTW requirements.

Important: In case analytical controls are partially outsourced, the company should have the corresponding internal procedures to ensure both traceability and accuracy of the results obtained.

³ Production clusters are understood as those geographic areas where INDITEX significantly centers its productions. For the purposes of this document, those clusters are 1) Europe; 2) North Africa; 3) Turkey; 4) India; 5) China; 6) Bangladesh and/or Pakistan; 7) Central America and South America.

⁴ Manufactured products are deemed to be those which have been synthesized by the company.

⁵ Partially manufactured products are those which have been formulated but not synthesized by the company.

⁶ Non manufactured products are deemed to be those which have been directly purchased from another manufacturer or distributor and which are sold under the label of the company which purchased them.

- Internal procedures to carry out the evaluation and selection of suppliers of raw materials, “*feedstock*” or “*press cake*”, the stability of the commercial relationships with them and the criteria these relationships are based on.
- Willingness of the company to inform INDITEX about any issue related with its supply chain, its manufacturing processes, its internal controls on product health, among others, with the aim of identifying the source of any potential restricted and/or regulated substances which might lead to a non compliance of international product health legislations.

After each technical audit and within 5 working days, TA or the corresponding INDITEX product health and safety team will issue the corresponding report to be provided to INDITEX’s technical committee. This report will evaluate the different issues covered during the technical audit as: Inappropriate; Appropriate; Good; Very good or Excellent.

Stage 4. Acceptance of an application from a company eligible to join “The List”

The decision to accept or reject the application received from a company eligible to join “The List” will be based on the compliance of the following requirements:

- To have net sales for manufactured dyestuffs/pigments of at least 80 % of the total net sales. In the case of auxiliaries manufacturers, both manufactured products and partially manufactured products (formulated) will be considered for this calculation.
- To obtain a satisfactory result in the technical audit of good manufacturing practices performed to their facilities what implies, at least, the following qualifications:
 - o Good: in all issues included in the section “*Product health policies*”.
 - o Good: in the section “*In-house laboratories and analytical instrumentation*”.
 - o Good: in the section “*Company staff technical qualification*”.

Exceptionally, INDITEX’s technical committee may consider that given the strategic importance of a company eligible to join “The List” for INDITEX’s productions in one or several production “*clusters*”, its application to “The List” could be accepted although it fails to comply with any of the above mentioned requirements.

Stage 5. Notice of acceptance of a candidate to join “The List”

In those cases where a company eligible to join “The List” meets the requirements mentioned under “*Stage 4. Acceptance of an application from a company eligible to join “The List”*”, INDITEX’s technical committee will contact directly the company via e-mail to inform about the final decision.

Stage 6. Notice of rejection of a candidate to join “The List”

In those cases where a company eligible to join “The List” fails to comply with the requirements mentioned under “*Stage 4. Acceptance of an application from a company eligible to join “The List”*”, INDITEX’s technical committee will contact directly the company via e-mail to inform about the final decision.

Important: Those companies which applications to join “The List” were rejected should not apply again until, at least, two further editions of “The List” were published after their initial request.

Stage 7. Prioritization of companies previously accepted to join “The List”

Applications accepted according to “Stage 4. Acceptance of an application from a company eligible to join “The List”” will be prioritized in order to define which are the companies that should be included in the following edition of “The List”. This prioritization process will rank the companies based on their compliance of the following criteria, organized according to their importance:

- To have net sales of dyestuffs/pigments and/or auxiliaries over 10,000 tons/year.
- To be present in at least 4 of the 7 INDITEX’s production clusters.
- To have net sales of dyestuffs/pigments and/or auxiliaries over 500 tons/year in all INDITEX’s production clusters where the company is present.

Note: In case this requirement is fulfilled by several companies, prioritization will be based on global net sales.

- To include in their portfolio dyestuffs/pigments for textile to be included in at least, 4 of the 8 sections of “The List” or acid dyes and/or pigments in the case of leather substrates. In the same way, in those cases where the company main activity is related to auxiliaries, their portfolio should include chemicals at least for 3 of the 4 sections of “The List” in the case of textile and at least for 2 of the 3 sections for leather.

Important: In the case of companies which portfolio includes both dyestuffs/pigments and auxiliaries, global net sales for both categories will be taken into account to define which category should comply with the previously mentioned requirements.

- To have technical and commercial support in all INDITEX’s production clusters where the company is commercially available.
- To be a member of international organizations aimed at reducing or removing impact on health and the environment coming from the chemical products they manufacture.

Important: One company will be prioritized over another as soon as it complies with a higher number of highest importance criteria instead of their total number. In case several companies comply with the same number of same importance requirements, decision will be taken considering the date of their request to be included in “The List”.

Note: Companies prioritization will be carried out with regard to all companies accepted previously to the date when the official decision is taken and communicated to all candidates.

Stage 8. Notice of prioritization a company previously accepted to join “The List”

INDITEX’s technical committee will inform via e-mail those companies which were prioritized to be included in the next edition of “The List”.

Stage 9. Improvements in the production of members of “The List”

In order to progressively reduce the risk of CTW non compliances in INDITEX productions and to comply more easily with “Zero Discharge” program by 2020, companies included in “The List” should sign and implement in their productions the requirements mentioned under “*Creating a healthier article: Guideline of recommended procedures for ensuring product health compliance during the manufacturing of dyestuffs and auxiliary chemicals. I. Control of restricted arylamines*” and its respective updates that will be provided to them as soon as they join the project.

Stage 10. Exclusion from “The List”

Any company involved in “The List” may be excluded by INDITEX’s technical committee on the following grounds:

- During the update of “The List”, at least a 5% of the tests conducted to the chemical products shown in the existing edition provide a result which implies a higher risk classification that what is currently shown.
- The company has intentionally left out some chemical products included in its portfolio or make use of malicious practices to commercialize chemical products previously classified as “C” in “The List”.
- The company declines to sign or fails to comply with any of the documents which govern the commitments acquired with INDITEX resulting from its inclusion in “The List”.
- According to information gathered from reliable sources, the information provided by the company to INDITEX during the process of joining “The List” is not accurate and/or truthful.

Note: Companies excluded from “The List” shall start the application process for joining “The List” from the initial stage of the procedure (see “Stage 1. Initial contact with a company eligible to join “The List””). However, their application will not be considered, until 2 further editions of “The List” have been published after the one the company was excluded from.

Stage 11. Request for voluntary striking off from “The List”

Any member included in “The List” may apply for its voluntary striking off. However, this will not be effective until the edition of “The List” immediately after the edition in course at the time of the application.

To apply for voluntary striking off, an e-mail should be sent to thelist@inditex.com explaining the reasons for such request. Then, INDITEX’s technical committee will officially notify the company the acceptance of their request and will provide an estimated date for the publication of the following edition of “The List” what means the time needed to make their request become effective.

Stage 12. Updates of “The List”

INDITEX commits itself to update “The List” at least once a year. Every new edition will entail the addition of a maximum number of 10 companies which will be selected from those previously prioritized according to their compliance of the prioritization criteria shown in “Stage 7. Prioritization of companies previously accepted to join “The List””.

Each update will include:

- An update of the classification of those chemical products included in the previous edition of “The List”.
- An update of the trade names of those chemical product included in the previous edition of “The List”.
- New chemicals belonging to both companies included in the previous edition and to companies which have just made “The List”.
- In case INDITEX deems appropriate, new product health parameters to classify the chemical products.

Stage 13. Validity of “The List”

Every edition of “The List” will be published on INDITEX web page⁷ and it will be considered as valid until the upload of a new edition.

Important: A new edition of “The List” will not be considered as official until it is published on INDITEX web page.

Stage 14. Re-Assessment Of Members Of “The List”

INDITEX’s technical committee may order the re-assessment of some of the companies included in “The List” upon occurrence of any of the following circumstances:

- The company is involved in a process of mergers or acquisitions.
- A high number of CTW non compliances were detected in INDITEX articles where chemical products belonging to the company have been used.

Note: Re-assessed companies should start the process of joining “The List” from the initial stage of the procedure (see “Stage 1. Initial contact with a company eligible to join “The List”).

⁷www.Inditex.com