

OASIS

[W A R E H O U S E]

Chemical policy

As a responsible retailer, Oasis and Warehouse are committed to the protection of workers in our supply chain, customers and the environment from risks posed by hazardous chemicals. This chemical policy includes all legislative duties we are required to comply with globally, which has important implications for our suppliers.

Oasis and Warehouse expect all our suppliers to supply products (including fabrics, components and packaging) that comply with applicable global legislative and regulatory requirements.

Please ensure you comply with the requirements in this policy and our Restricted Substance List (RSL) which forms part of our policy. The RSL sets out restricted substances and respective safe maximum limits of chemicals Oasis and Warehouse are able to accept in all finished goods supplied to us. Please note that the RSL will change as legislation changes.

You are required to have chemical management procedures in place, including testing and records to support and evidence your compliance (see below for further details).

1. REACH

REACH stands for Registration, Evaluation, Authorisation and Restriction of Chemicals and is an EU regulation that came into force in June 2007. The purpose of REACH is to improve the protection of human health and environment from risks posed by chemicals.

Our new policy clarifies duties relating both to ourselves and those of our suppliers, as set out in the table in Appendix A (see definitions and links in Appendix A and in our RSL).

2. California Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986).

Known more commonly as Prop 65, this legislation applies in California and has duties for any company that retails in California (whether in physical stores or online). The legislation is designed to address concerns relating to toxic chemicals.

We require suppliers to comply with the safe limit levels set out by Prop 65, which are known under this regulation as 'safe harbour levels'. Please note that levels may be different (and more stringent) than those of REACH's for the same chemical.

3. All other legislation in US, Europe and other countries

As a supplier you are responsible for ensuring that products supplied to Oasis & Warehouse comply with applicable global legislative and regulatory requirements.

You will be liable to cover any costs incurred by Oasis & Warehouse in the event that any products fail to comply with international requirements and/or our chemical policy, including our RSL.

4. Testing (mandatory and due diligence)

Oasis and Warehouse require mandatory test reports for all high-risk products. As a result, you will need to submit test reports from nominated laboratories to demonstrate compliance where high-risk chemicals are relevant to your products (see the RSL).

Please refer to the updated testing performance tables in our supplier manual, for test details.

Mandatory test reports must be submitted to Oasis and Warehouse prior to shipment, at the very latest. Where these are not submitted on time you may be liable for costs incurred where orders run late (e.g. air-freight costs)

In addition to mandatory tests, we will conduct due diligence tests on a percentage of products once they arrive at our DC.

5. Action for suppliers

Oasis and Warehouse requires all suppliers to ensure all products and packaging meet the limits set out in our RSL. To ensure compliant product, suppliers must:

1. Communicate our RSL upstream to material, component and chemical suppliers.
2. Source materials/components responsibly at development/order stage by requesting declarations, recognised certifications and/or test reports from your suppliers showing compliance to our RSL.
3. Map material/component sources to establish compliant sources.
4. Test materials/components for high-risk chemicals and submit to us prior to shipment (keeping your own test reports on record as your record of compliance).
5. Highlight any non-conformance with our RSL prior to starting production/delivery.
6. Respond swiftly to Oasis and Warehouse's request to see evidence of compliance in cases of customer complaints or enforcement authority challenge.

6. Oasis and Warehouse actions on chemical failures

Should the supplier become aware of any product that may not comply with our RSL, you shall notify Oasis and Warehouse immediately. You must provide evidence of compliance and product information required in the format set out below. You agree to co-operate with all reasonable requests to provide such information as necessary to demonstrate evidence of testing and product compliance.

Dealing with complaints and enforcement authority challenges:

In the event that:

1. Oasis and Warehouse receives notice that a product supplied by you does not comply with our RSL; or
2. Oasis and Warehouse carries out testing on your products and determine a failure to comply with our RSL; or
3. Oasis and Warehouse receives a complaint from our customer,

We will take steps to immediately withdraw the Product from further sale.

Oasis and Warehouse will not accept products which fail to comply with our RSL and reserves the right to:

- Reject non-compliant Products
- Require re-working of the Products to comply with our RSL;
- Test and/or conduct a Product recall;
- Cancel any undelivered order/s;
- Discount / price reduction of delivered orders;
- Apply service credits
- Apply monetary deductions including but not limited to covering the cost of paying fines to an enforcement authority
- Account for any lost profits incurred by Oasis and Warehouse as a result of a Product recall
- Destroy or safely dispose of Products (at supplier's cost)
- Reject stock (supplier to arrange and pay for the cost of storage and collection)
- Recover associated costs from suppliers

Product information required to be submitted supplier, when non-compliance is detected:
Product name/description
Product SKU
PO number
Quantity of affected product supplied to Oasis and Warehouse
Name of restricted substance present in product
CAS (chemical abstract service) number
The level of Restricted Substance detected and as a percentage of the weight of the individual component within the Product(s).
Weight of product
Details of product testing (include testing for lead)
Details of other orders which may be affected

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ⁱ This policy replaces our previous REACH policy.

Appendix A – REACH

	REACH	Oasis and Warehouse's REACH duties	Suppliers required to:
A	Article producers and importers are required to register substances intended to be released from articles if this meets or exceeds the threshold of 1 tonne per year and the substance is not already registered for that use ⁱ .	As fashion retailers, registration would only be relevant if we supplied articles in the EU which have the intention to 'release' a substance (i.e. it is a deliberate feature of the article, such as nail varnish or scented t-shirts or candles).	<ul style="list-style-type: none"> Suppliers to provide proof of registration to ECHA if the amount of the released chemical in an article is an SVHC and could exceed 1 tonne per annum.
B	Article producers and importers are required to notify ECHA of substances in the Candidate List if this meets or exceeds the threshold of 1 tonne per year and if the concentration is 0.1% weight by weight of the article and the substance has not already been registered.	We are required to notify ECHA if an article contains a substance in the Candidate List which meets or exceeds the annual threshold of 1 tonne per year (0.1% weight by weight of the article)	<ul style="list-style-type: none"> Suppliers to inform us if any SVHC are present above 1,000 ppm (0.1% weight by weight in articles supplied to us.
C	Communicate (to either recipients or consumers) substances in the Candidate List if in concentration of 0.1% weight by weight in articles within 45 days of request.	Provide information to our customers if they request information on SVHCs in articles.	<ul style="list-style-type: none"> Suppliers must provide chemical content request to enable Oasis and Warehouse to meet the 45 day response timeframe.
D	Comply with the limits of Annex XVII	Ensure all products we retail comply with limits of Annex XVII	<ul style="list-style-type: none"> Ensure all products supplied to Oasis and Warehouse comply with limits to Annex XVII

Key terms used in REACH:

- **Substance:** A substance is a chemical element and its compounds in the natural state or the result of a manufacturing process. Examples of substances are: metals, solvents, dyes and pigments.
- **Mixture:** is a mix or solution of two or more substances. Under the EU chemicals legislation, mixtures are not considered substances.
- **Article:** an object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition. As

fashion brands, almost all products sold by Oasis and Warehouse are likely to be classed as articles.

- Article importer and supplier: An article importer is any company located inside the EU that imports articles from countries that are located outside the EU. An article supplier is irrespective of whether the supplier produces the articles himself or whether he purchases them (inside or outside of the EU). Thus, Oasis and Warehouse are both article importers and suppliers (you may also be an article supplier if you operate in the EU).
- Article producer is a producer of articles within the EU, regardless of how the articles are produced and where they are placed on the market. They are also considered article suppliers under REACH. Those companies operating inside the EU have legal duties under REACH. If you are a supplier outside the EU, you do not have specific legal duties, but your support is required to enable Oasis and Warehouse to meet our legal responsibilities.
- ECHA: is the European Chemicals Agency which has a central coordination and implementation role in the overall regulation process of REACH.
- Substances of Very High Concern (SVHC): These are substances classed as carcinogenic, mutagenic or toxic, according to the criteria in Annex XIII or REACH.
- Candidate list: a list of substances of very high concern (SVHC) that are identified as potential targets to be regulated for use within the EU by the process of authorization. Substances are added to the Candidate List by ECHA. See link for Candidate list: <https://echa.europa.eu/candidate-list-table>
- Annex XIV: A Candidate List substance which has been placed in Annex XIV cannot be placed on the market or used after a given date (known as the sunset date), unless an authorisation is granted for a specific use, or the use is exempted from authorisation.
- Annex XVII: This annex contains hazardous substances that are restricted or banned and includes lead, azo dyes, DMFus, PAHs, Phthalates, PFOs, Nickle, etc. A restriction can apply to a substance on its own or in a mixture, or to an article containing the substance. There are no tonnage thresholds for restrictions. Restrictions take many forms and include, for example: general bans on all uses; bans on specific uses (e.g. a flame retardant); a ban for products available to the general public; or limits on the concentration of the substance in consumer products such as clothing or jewellery. See link for Annex XVII: <https://echa.europa.eu/substances-restricted-under-reach>
- Recipient: Industrial or professional users and distributors (does not include consumers)

Appendix B – Prop 65

List of chemicals restricted under Prop 65 can be found here:

<https://oehha.ca.gov/proposition-65/proposition-65-list>

California Proposition 65	Oasis and Warehouse's duties	Suppliers required to:
Companies must comply with the safe limit levels of chemicals identified by the Californian Office of Environmental Health Hazard Assessment (OEHHA).	Remove from the US market any products that do not comply with the safe limit levels of Prop 65	<ul style="list-style-type: none">Comply with the safe limit levels of Prop 65 and keep test reports to identify this. Where a product exceeds the limit you must notify Oasis and Warehouse so that we can take appropriate action. Please see our RSL.