



Brooks Sports Chemical Management Program

Program Vision

Brooks Chemical Management Program exists to minimize the use of toxic substances from materials and manufacturing processes that have a potential to do harm to people or the environment either in use or disposal. This strategy will ultimately evolve to meet our goal of eliminating all hazardous substances from our product supply chain.

Brooks Chemical Management Program is broken-down into three parts:

1. Restricted Substances List
2. Product and Material Testing
3. Innovation through Industry Collaboration

1. Restricted Substances List (RSL)

Brooks RSL includes restrictions of substances from four different areas of focus in our supply chain. Those categories are:

1. Footwear Materials and Products
2. Apparel Materials and Products
3. Manufacturing of Final Products
4. Packaging Materials

The purpose of the RSL is to communicate to our suppliers which chemicals are either strictly prohibited from use, or the level to which chemicals need to be limited.

How does Brooks identify chemicals to include in its RSL?

Our RSL includes at minimum all chemicals that are regulated by the most-stringent legal regulations in any region globally, including EU REACH and CA Prop 65. We also voluntarily include many other substances that are hazardous for humans or the environment, but that are not yet being regulated by any government body. We identify those voluntary substances through a variety of resources, some of which include the AAFA, AFIRM, ChemSec, and other leading industry organizations.

How often is Brooks RSL updated?

We are continually reviewing chemical impact assessments and make updates to our RSL at least once per year. Between 2011 and 2012, there were three version updates made to our RSL.

Who must comply with Brooks RSL?

All suppliers of Brooks Sports, Inc. products must comply with Brooks RSL. We maintain this understanding through our RSL Compliance Agreement, which is signed by all Brooks suppliers with each updated version of Brooks RSL. Each shipment of products to Brooks constitutes the supplier's warranty that the goods shipped fully comply with Brooks RSL.



2. Product and Material Testing

Our product and material testing programs uphold our RSL Compliance Agreement with suppliers in order to ensure that our RSL is meeting its objectives. Every new material introduced to the Brooks supply chain is required to be tested. Testing must be done through one of the four approved independent third-party testing bodies approved by Brooks. A diagram of our testing process is shown on page 3 of this document.

How often are materials tested for restricted substances?

All new materials must be tested against our RSL before they are implemented into Brooks products, and are subsequently retested at least annually. In addition, Brooks reserves the right to randomly select and test at any stage of production, including materials, components, or finished products.

Which substances are we testing for?

Because we have an extensive number of chemicals included in our RSL (over 450 individual chemicals), we require suppliers to test for only the most high-risk chemicals that are most likely to appear in our products. Between footwear and apparel, we have identified 18 categories of high-risk chemicals.

What does Brooks do in the case of failed chemical testing?

In the case of a failed test, the factory is required to complete Brooks' Corrective Action Form, which puts in place a strategy to come back into compliance with our RSL. The corrective action must be implemented immediately, and is generally done so within one week. In the case of repeated test failures, Brooks will reject the purchase and use of that material from the supplier.

How do we ensure Brooks products do not contain chemicals not identified as especially high-risk, and that are not included for testing?

Any chemical used in the manufacturing process of Brooks products is required to be documented on Brooks Chemical Register Form, so that we are able to monitor all chemicals going into our products. This register is cross-checked to ensure that every chemical on the form meets Brooks RSL requirements. We also prefer to do business with and encourage our suppliers to obtain a third-party sustainable production certification, such as Bluesign, to further assure that our factories are operating within the boundaries of our RSL.

3. Innovation through Industry Collaboration

Our vision of a clean supply chain free of all hazardous chemicals is not unique to Brooks, nor can it be accomplished on our own. In order to progress towards our goal, we stay actively engaged with innovation taking place on an industry-wide scale. Primarily, this has been done through work with the Chemicals Management Working Group (CMWG) of the Outdoor Industry Association. In 2013, Brooks participated in completing the CMWG's first draft of its Chemicals Management Framework. The tool provides incremental stepping stones to accomplishing the chemical management goals of the footwear and apparel industry, and a way to jointly focus our improvement efforts. We are using the CMWG and their Framework as our industry roadmap towards the elimination of hazardous chemicals.

Brooks RSL Testing Process

