Responsible Chemicals Program

March 2024

Introduction

We know that the run offers happiness, health & transformation. Running can change everything: your day, your life, and even the whole world. But to create change on a global scale, we have to do more to make those benefits accessible to all people. So, we have a simple goal: every human who wants to run gets to run and has a place to do it.

Our Corporate Responsibility priorities set us on a path to making real and lasting progress toward our goal. Our Responsible Sourcing program is one of these priorities and ensures our materials and products are sustainably and ethically sourced, and that every worker can thrive. We know that a responsible global supply chain starts with the decisions we make, which is why we partner with factories and suppliers that share our values and commitments to trace our supply chain, respect human rights, promote factory employee voice, and reduce environmental impact.

Our Responsible Sourcing program measures social and environmental compliance against the Brooks Supplier Code of Conduct and local law, at factories across our manufacturing supply chain. In addition, it aims to assist suppliers along their continuous improvement journey to go beyond compliance, toward our long-term vision of a sustainable supply chain.

A key component of our Responsible Sourcing priority is our Responsible Chemicals program that is tasked with ensuring factories manufacturing Brooks product and materials use only chemicals that are safe for people and the planet. We take a holistic view of chemicals management, managing chemicals entering the factory (Input Management), exiting the factory (Output Management), and the use of chemicals in the factory (Facility Chemicals Management)

To drive the use of safer chemicals across Brooks' supply chain we have set the following commitments:

	Commitment
Input management	100% of input chemicals used at in-scope factories[1] comply with the ZDHC MRSL (conformance Level 1) by 2025
Factory Chemical Management	100% of in-scope factories[2] achieve and maintain Higg FEM Chemicals Management section level 1 and work towards achieving level 3
Output Management	100% of in-scope factories[2] achieve ZDHC Wastewater Foundational Level for heavy metals, conventional, and MRSL parameters by 2025
VOCs	Reduce organic solvent usage to under 25 grams/pair by 2025
DWRs	100% DWR and non-wicking treatments are nonfluorinated (C0) by 2025

Basic Principle

Suppliers implement Brooks' Responsible Chemicals program with **transparency**. We understand the complexity of chemicals management but believe transparency is the foundation for true collaboration and partnership, thus Brooks is committed to working with suppliers who are open and honest with us. Suppliers shall maintain complete, as well as accurate records and information so that compliance can be effectively assessed. Suppliers must not falsify or understate any aspects of the operations to Brooks or audit representatives.

We also require suppliers to implement Brooks' Responsible Chemicals program with **effective management systems** that are essential, to provide the framework for policies and procedures and ensure compliance is part of the day-to-day operation at the facility. A supplier with a strong internal compliance system will be

[1] 100% of Tier 2 midsole/outsole factories and high-volume Tier 2 textile factories
[2] 100% of footwear Tier 1 factories, Tier 2 midsole/outsole factories and high-volume Tier 2 textile factories

alerted immediately when any non-compliance issues happen, will be able to address without delay, and have preventative measures in place to help ensure any issues do not reoccur.

All Tier 1 and Tier 2 suppliers may not **subcontract** any operation in the manufacturing process without prior written consent from Brooks, and only after the subcontractor has agreed to comply with the Brooks Supplier Code of conduct.

Input Management

Traditional chemical management approaches have focused on eliminating hazardous chemicals from finished materials and final product through compliance with a Restricted Substances List (RSL). In recent years, the apparel and footwear industry has evolved beyond RSL compliance by adding additional due diligence measures to control chemicals entering the factory through compliance with a Manufacturing Restricted Substances List (MRSL).

Preventing hazardous chemicals from entering the production process, known as *input management*, is now an integral part of effective chemicals management and is an essential approach to ensure safer factory discharges, such as wastewater and air emissions, protecting factory employees and the surrounding environment, and more consistent RSL material compliance.

Brooks is committed to ensuring that all chemicals entering factories manufacturing Brooks material and product minimize risk to human health, improve factory employee safety, and limit the impact on the environment. As such, we have committed to **100% of input chemicals used at in-scope factories[3] comply with the ZDHC MRSL by 2025**.

Our approach to achieve this goal is to align with the wider apparel and footwear industry by adopting the ZDHC MRSL, a list of chemical substances that are banned from intentional use in factories:

> *Different chemical formulations are used in production practices. In turn, each of those formulations is made from a list of substances. The ZDHC MRSL looks in detail at those substances. It establishes acceptable limits for each one and outlines which ones to avoid, in particular those banned from intentional use.*
>
> *The ZDHC MRSL helps chemical formulators by offering guidance on substances they can avoid using in their products. Suppliers also benefit. To make materials, they must source various chemical products from formulators. The ZDHC MRSL makes that easier by proving the absence of hazardous substances in those products.*
>
> (Source: Roadmap to Zero - Input)

Our Expectations:
Brooks requires in-scope factories to source chemicals that are ZDHC MRSL compliant and meet conformance level 1 by 2025.

Demonstrating Compliance:
Suppliers should communicate with their chemical suppliers to ensure all chemicals purchased are MRSL compliant. The ZDHC Gateway Chemical Module is a database of chemical products and their ZDHC MRSL conformance level. Suppliers can use this tool to cross check their chemical products and find substitutions with higher conformance levels for continued performance improvement.

Suppliers shall demonstrate compliance with the ZDHC MRSL via the Performance InCheck Report. Below is a summary of the necessary steps with further information available here.

1) Create ZDHC Gateway account via invitation link (Brooks will send the link)
2) Select Solution Provider on Implementation HUB website
3) Create an account on solution provider tool and select InCheck option (if required)
4) Supplier uploads chemical inventory on solution provider tool

[3] 100% of Tier 2 midsole/outsole factories and high-volume Tier 2 textile factories

5) Performance InCheck report is delivered via solution provider tool to supplier
6) Performance InCheck report (PDF and .xls data) is stored in ZDHC Gateway supplier account
7) Performance InCheck report data availability is flagged on supplier account (visible to Brooks)

Brooks will review submitted InCheck reports and provide comment. Where necessary, supplier will implement a Corrective Action Plan (CAP) including substituting non-compliant substances with ZDHC MRSL compliant alternatives or engage their chemical suppliers to request they register and list their chemicals in the ZDHC Gateway.

Apparel Materials Approach:
Input chemicals at factories manufacturing Brooks apparel nominated fabrics and trims are managed by sourcing materials that are either:
- Bluesign® approved, or
- Manufactured at a factory that achieve, at a minimum, conformance level 1 for ZDHC MRSL

Factory Chemical Management

A critical component of an effective chemicals management program is the implementation of policies and practices to appropriately manage chemical use in a manufacturing factory, including inventory management, storage, handling, use, and health & safety.

Our Expectations:
Brooks is committed to working with manufacturing factories that implement best-in-class chemicals management practices and we have set the goal to**100% of in-scope factories[4] achieve and maintain Higg FEM Chemicals Management section level 1 and work towards achieving level 3**.

We expect facilities to implement the ZDHC Chemical Management System (CMS) framework that lists the minimum requirements for a CMS. Suppliers should reference the ZDHC CMS Technical Industry Guideline that provides more specific, technical information to support implementation of the ZDHC CMS Framework.

Demonstrating Compliance:
Factory implementation of the ZDHC CMS framework will be evaluated via the Higg Facilities Environmental Module (Higg FEM) and more specifically, the Chemicals Management section. The Higg FEM should be completed annually by each factory manufacturing Brooks product or materials and verified by an SAC approved verifier. Higg FEM self-assessment should be complete and posted by April 30th each year and verified by an SAC approved verifier before June 30th each year.

Brooks will review the verified Higg FEM and provide feedback to suppliers. When a factory does not meet Brooks' above stated Higg FEM level goal, supplier shall be required to take appropriate actions to ensure they meet the required performance level in the subsequent Higg FEM assessment.

Apparel Materials Approach:
Chemical use at factories manufacturing Brooks nominated apparel fabrics and trims are managed by sourcing materials from factories that are either:
- Bluesign® site compliant, or
- achieve and maintain Higg FEM Chemicals Management section level 1, or
- Oeko-Tex STeP certified, or

[4] 100% of footwear Tier 1 factories, Tier 2 midsole/outsole factories and high-volume tier 2 textile factories

- ZDHC StZ Aspirational Level – StZ (Supplier to Zero) is the official ZDHC entry gate to sustainable chemical management, including Foundation Level (Self-evaluation & Self-declaration), Progressive Level (Provide evidence & Document Review), Aspirational Level (Onsite verification)

Output Management

There are multiple forms of outputs at a manufacturing facility including waste, wastewater, sludge, air emissions, and finished product. To mitigate against pollution and to protect the surrounding environment, communities, and consumers, it's critical these outputs are managed, treated, and discharged properly.

Brooks is committed to ensure no hazardous chemicals exit factories manufacturing Brooks product and materials and has committed to 100% of in-scope factories[5] achieve ZDHC Wastewater Foundational Level for heavy metals, conventional, and MRSL parameters by 2025.

Materials & Finished Product:

Our Expectations:
The Brooks Restricted Substances List (RSL) (see page 9) defines those substances that we restrict or eliminate from our products.

All materials in Brooks product and all finished product must comply with our RSL.

Final product safety and RSL compliance is the responsibility of Tier 1 final assembly suppliers. Material/component RSL compliance is the responsibility of Tier 2 material suppliers.

We communicate our restricted substances requirements to all our suppliers through our RSL and maintain this understanding through our Code of Conduct and RSL Compliance Agreement, which shall be signed by all suppliers with each updated version.

Demonstrating Compliance:
Every material is required to be tested against the Brooks RSL. Testing must be conducted at a Brooks approved lab. Further details on testing procedure can be found on page 8 of this document.

All Brooks apparel materials must be either bluesign® approved, Oeko-Tex 100 standard certified or have a RSL test showing compliance to Brooks RSL.

Wastewater and Sludge:

Our Expectations:
We have aligned with the apparel and footwear industry and adopted the ZDHC wastewater guidelines, a unified set of expectations across the industry for wastewater discharge quality that goes beyond regulatory compliance. It covers not only conventional wastewater parameters, but also hazardous substances in the ZDHC MRSL. **Brooks requires suppliers to comply with the ZDHC Wastewater Guidelines**, specifically:

- Factories with **industrial wastewater**: at a minimum, are required to meet the foundational limits for heavy metals, conventional, and MRSL parameters and shall meet the reporting limits for both wastewater and sludge. Through continuous improvement actions on input chemical management and the effluent treatment processes, a supplier can advance from meeting Foundational level to meeting Progressive or Aspirational Level.

[5] 100% of footwear Tier 1 factories, Tier 2 midsole/outsole factories and high-volume Tier 2 textile factories

- Factories with **domestic wastewater only**: are required, at a minimum to, comply with Higg FEM Level 1.

Demonstrating Compliance:
Suppliers shall conduct sampling of wastewater twice per year before April 30th and October 31st using a ZDHC approved lab. Brooks will review wastewater test reports and provide comment. For non-conformities against the ZDHC Wastewater guidelines, a supplier shall conduct a root cause analysis to generate and implement a CAP. ZDHC CMS Technical Industry Guide is a good resource for CAP.

Apparel Approach:
Wastewater and sludge at factories manufacturing Brooks apparel nominated fabrics and trims are managed by sourcing materials that are either:
- Bluesign® approved, or
- Manufactured at a factory that meets all the requirements of the ZDHC wastewater guidelines:
  - Achieve Foundational level for conventional and heavy metal parameters
  - Meet all reporting limits for ZDHC MRSL wastewater parameters
  - Meet the ZDHC recommended disposal pathway for sludge

Air Emissions and Solid Waste:

Our Expectations:
Brooks' approach to assess supplier's appropriate management of air emissions and solid waste is to adopt the Higg Facilities Environmental Module (Higg FEM). **Suppliers are expected at a minimum to achieve Higg FEM level 1 across all sections of the Higg FEM.**

Demonstrating Compliance:
The Higg FEM should be completed annually and verified by an SAC approved verifier. Suppliers need to annually purchase Higg FEM by January 1st, complete & post self-assessment by April 30th, and complete & post verification by June 30th. Brooks will review the verified Higg FEM and provide comment. Factories with no Higg FEM level achieved will be required to implement a CAP and take necessary action to ensure Higg FEM level 1 performance is achieved at a minimum. Brooks' long-term goal is that facilities achieve Higg FEM level 3, and we expect suppliers to proactively take steps towards achieving this level of performance. Suppliers should reference the ZDHC CMS Framework and ZDHC CMS Technical Industry Guide for appropriate management of air emissions and solid waste outputs.

Apparel Approach:
Air emissions and solid waste at factories manufacturing Brooks nominated apparel materials (fabrics, trims, fasteners, embellishments) are managed by:
- Materials sourced from Asia: source only from bluesign® site compliant factories.
- Materials sourced from Central America: source materials from suppliers that are either Oeko-Tex STeP certified (or are working towards certification before 2025) or achieve and maintain Higg FEM level 1.

Volatile Organic Compounds

Chemicals used to manufacture materials and assemble our product are essential for ensuring the quality and performance of our gear. However, certain chemicals can negatively impact the health of factory employees and the planet. Volatile Organic Compounds (VOCs) are a class of chemicals commonly found in certain chemicals used in the manufacture of footwear and apparel and **Brooks has committed to reduce organic solvent usage to under 25 grams/pair from all chemicals used in the manufacture of Brooks footwear by 2025**.

Our Expectations:
All primers, adhesives, cleaners, hardeners, detergents, inks, and paints shall be water-based or low VOCs by no later than 2025.

Demonstrating Compliance:
Suppliers need to provide the chemical usage data each quarter. Brooks will review, analyze, and comment, based on Water Based Chemical Replacement Plan. Facilities not on track will be required to analyze the root cause and update the strategy.

Durable Water Repellents / Non-Wicking Treatments

Brooks is committed to eliminate Per- & Polyfluoroalky (PFAS) chemicals in Durable Water Repellent (DWR) chemicals and non-wicking treatments across all footwear and apparel materials & final product.

Our Expectations:
All DWR and non-wicking treatments shall be nonfluorinated (C0) alternatives by no later than 2025. C8-based Perfluorinated chemicals must not be used on any Brooks product.

Demonstrating Compliance:
Each development season, suppliers shall submit DWR and non-wicking treatment material list with all PFASs declaration – C6, C4, C0/PFAS Free, and all applicable MSDS. Each development season, suppliers need to demonstrate PFAS status by total Fluorine test and all individual PFAS listed test. Suppliers with PFAS content (C6 and C4) will be required to seek replacement. Each CY, summarize PFAS Free % by material weight.

Brooks Sports
Restricted Substances List

Last updated March 2024

1. INTRODUCTION

Brooks is committed to operating in a sustainable manner in order to protect consumers, workers, and the environment. As a participant in the Brooks supply chain, we expect suppliers to understand and comply with the requirements in this latest Brooks Restricted Substances List ("RSL") updated March, 2024. If you have any questions, please contact Victor Song (Victor.Song@brooksrunning.com).

2. SCOPE

The RSL applies to all Brooks materials and finished products.

3. RSL AGREEMENT

All materials used in any Brooks product must comply with the RSL. Tier 1 factories are responsible for all subcontractors. Use of a subcontractor is not allowed unless it has also agreed in writing to comply with this RSL. On behalf of _____(supplier name), I, _____(name) agree to comply with the requirements herein, including prohibitions and limitations. I understand that compliance with all applicable laws and the RSL is a condition to, and incorporated in, each and every order placed by Brooks Sports; each shipment constitutes our warranty that the goods shipped fully comply with the RSL; and any subcontractor we use has also agreed in writing to comply with this RSL. I understand Brooks sells its products worldwide and each and every product has to adhere to this RSL and the local laws of each jurisdiction where we sell products. If the laws in a particular jurisdiction are more strict than this RSL, the laws apply. We agree to defend and indemnify Brooks against any claim that a product, material, process, or component does not comply with the RSL or the applicable laws of any jurisdiction where Brooks sells product.

I am an owner, director, officer or managing agent of Supplier, and I am authorized to sign this RSL Agreement and bind Supplier. AGREED TO ON_____(date)

By_____(print name)

Signed_____(signature)

Representative of _____(supplier name)

4. ABBREVIATIONS

4.1. CAS

CAS registry numbers are unique numerical identifiers for chemical elements, compounds, polymers, biological sequences, mixtures and alloys. Chemical Abstracts Service (CAS), a division of the American Chemical Society, assigns these identifiers to every chemical that has been described in the literature. The intention is to make database searches more convenient, as chemicals often have many names. Almost all molecule databases today allow searching by CAS number.

4.2. Brooks Limit

The maximum limit of the substance allowed in the finished product.

4.3. Usage Ban

For several chemical substances or substance groups a usage ban is defined. For these substances or substance group intentional use in manufacturing of articles is prohibited. That means that chemical products used for manufacturing of articles must not intentionally contain these substances or substance groups.
The aim of a usage ban is to avoid release of harmful substances to the environment and to avoid occurrence in the manufactured article by precautionary principle.

5. RESTRICTED SUBSTANCES LIST

CAS NO.	Restricted Substance	Brooks Limit	Test Method and Comments
	Acetophenoe and 2-Phenyl-2-Propanol		
98-86-2	Acetophenone	50ppm	Extraction in acetone or methanol GC/MS, sonication at 60℃ for 30mins
617-94-7	2-phenyl-2-propanol	50ppm	
	AP (alkylphenols), APEO (alkylphenol ethoxylates)		
Various	NP (Nonylphenol), mixed isomers NPEOs (Nonylphenol ethoxylates) OP (Octylphenol), mixed isomers OPEOs (Octylphenol ethoxylates)	10ppm for sum of AP, 100ppm for sum of APEO & AP	Align with AFIRM
	Asbestos (6 kinds)		
77536-66-4 12172-73-5 77536-67-5 12001-29-5 12001-28-4 77536-68-6	Actinolite Amosite Anthrophyllite Chrysotile Crocidolite Tremolite	Usage ban	REM/EDX BGI 505-46 or U.S EPA/600/R-93/116
	Azo Dyes (28 Kinds)		
92-67-1 92-87-5 95-69-2 91-59-8 97-56-3 99-55-8 615-05-4 101-77-9 91-94-1 119-90-4 119-93-7 838-88-0 101-14-4 101-80-4 139-65-1 95-80-7 95-53-4 137-17-7 95-68-1 87-62-7 106-47-8 120-71-8 90-04-0 60-09-3 3165-93-3 553-00-4 39156-41-7 21436-97-5	4-Aminobiphenyl Benzidine 4-Chloro-o-toluidine 2-Napthylamine o-Aminoazotoluene 2-Amino-4-nitrotoluene 2,4-Diaminoanisole 4,4'-Diamino-diphenylmethane 3,3'-Dichlorobenzidine 3,3'-Dimethoxybenzidine 3,3'-Dimethylbenzidine 3,3'-Dimethyl-4,4'-diaminodiphenylmethane 4,4'-Methylen-bis-(2-chloraniline) 4,4'-Oxydianiline 4,4'-Thiodianiline 2,4-Toluenediamine o-Toluidine 2,4,5-Trimethylaniline 2,4-Xylidine 2,6-Xylidine *p*-Chloraniline *p*-Cresidine *o* –Anisidine (2-Methoxyaniline) p-Amino azobenzene 4-Chloro-o-toluidinium chloride 2-Naphthylammonium acetate 4-Methoxy-m-phenylene diammonium sulphate 2,4,5-Trimethylaniline hydrochloride	Usage Ban (Under 5ppm)	Align with AFIRM
	Bis-phenols		
80-05-7	Bis-phenol A (BPA)	Usage ban (Under 1ppm)	a. Align with California Prop 65 Test Protocol for textile. b. Align with AFIRM for other materials. Implement a & b for textile. Implement b for other materials only.
80-09-1 77-40-7 620-92-8 1478-61-1	Bis-phenol S (BPS) Bis-phenol B (BPB) Bis-phenol F (BPF) Bis-phenol AF (BPAF)	1,00ppm for BPAF 1,000ppm for other	Align with AFIRM
	Chlorophenols		
15950-66-0 933-78-8 933-75-5 95-95-4 88-06-2 609-19-8 4901-51-3 58-90-2 935-95-5 87-86-5	2,3,4-Trichlorophenol (TriCP) 2,3,5-Trichlorophenol (TriCP) 2,3,6- Trichlorophenol (TriCP) 2,4,5-Trichlorophenol (TriCP) 2,4,6-Trichlorophenol (TriCP) 3,4,5-Trichlorophenol (TriCP) 2,3,4,5-Tetrachlorophenol (TeCP) 2,3,4,6-Tetrachlorophenol (TeCP) 2,3,5,6-Tetrachlorophenol (TeCP) Pentachlorophenol (PCP), its salts, esters	0.5ppm each	EN 17134-2:2023

CAS NO.	Restricted Substance	Brooks Limit	Test Method and Comments
	Chlorinated Benzenes and Toluenes		
95-49-8 108-41-8 106-43-4 32768-54-0 95-73-8 19398-61-9 118-69-4 95-75-0 2077-46-5 6639-30-1 76057-12-0 875-40-1 1006-31-1 877-11-2 541-73-1 106-46-7 87-61-6 120-82-1 108-70-3 634-66-2 634-90-2 95-94-3 608-93-5 118-74-1 5216-25-1 98-07-7 100-44-7 95-50-1	2-Chlorotoluene 3-Chlorotoluene 4-Chlorotoluene 2,3-Dichlorotoluene 2,4-Dichlorotoluene 2,5-Dichlorotoluene 2,6-Dichlorotoluene 3,4-Dichlorotoluene 2,3,6-Trichlorotoluene 2,4,5-Trichlorotoluene 2,3,4,5-Tetrachlorotoluene 2,3,4,6-Tetrachlorotoluene 2,3,5,6-Tetrachlorotoluene Pentachlorotoluene 1,3-Dichlorobenzene 1,4-Dichlorobenzene 1,2,3-Trichlorobenzene 1,2,4-Trichlorobenzene 1,3,5-Trichlorobenzene 1,2,3,4-Tetrachlorobenzene 1,2,3,5-Tetrachlorobenzene 1,2,4,5-Tetrachlorobenzene Pentachlorobenzene Hexachlorobenzene p-Chlorobenzotrichloride Benzotrichloride Benzyl chloride 1,2-Dichlorobenzene	10ppm for highlight green 1ppm for sum of others	EN 17137:2018
	Dimethylfumarate		
624-49-7	Dimethyl Fumarate (DMFu)	Usage ban (Under 0.1ppm)	ISO/TS 16186：2021
	Disperse Dyes (30 kinds)		
2475-45-8 2475-46-9 3860-63-7 3179-90-6 56524-77-7 56524-76-6 12222-75-2 12222-97-8 12223-01-7 61951-51-7 23355-64-8 2581-69-3 730-40-5 82-28-0 12223-33-5 13301-61-6 51811-42-8 85136-74-9 119-15-3 2832-40-8 6300-37-4 6373-73-5 6250-23-3 12236-29-2 54824-37-2 54077-16-6 2872-52-8 2872-48-2 3179-89-3 61968-47-6	Disperse Blue 1 Disperse Blue 3 Disperse Blue 26 Disperse Blue 7 Disperse Blue 35A Disperse Blue 35B Disperse Blue 35 Disperse Blue 102 Disperse Blue 106 Disperse Blue 124 Disperse Brown 1 Disperse Orange 1 Disperse Orange 3 Disperse Orange 11 Disperse Orange 37/76/59 Disperse Orange 149 Disperse Yellow 1 Disperse Yellow 3 Disperse Yellow 7 Disperse Yellow 9 Disperse Yellow 23 Disperse Yellow 39 Disperse Yellow 49 (6858-49-7) Disperse Yellow 56 Disperse Red 1 Disperse Red 11 Disperse Red 17 Disperse Red 151	Usage Ban (Under 30ppm each)	DIN 54231: 2022

CAS NO.	Restricted Substance	Brooks Limit	Test Method and Comments
	Carcinogenic Dyes (17 kinds)		
3761-53-3 569-61-9 569-64-2 2437-29-8 10309-95-2 548-62-9 632-99-5 1937-37-7 2602-46-2 2580-56-5 573-58-0 16071-86-6 60-11-7 6786-83-0 561-41-1 118685-33-9 Not allocated	C.I. Acid red 26 C.I. Basic Red 9 C.I. Basic Green 4 C.I. Basic Violet 3 C.I. Basic Violet 14 C.I. Direct Black 38 C.I. Direct Blue 6 C.I. Basic Blue 26 C.I. Direct Red 28 C.I. Direct Brown 95 4-Dimethylaminoazobenzene (Solvent Yellow 2) C.I. Solvent Blue 4 4,4'-bis(dimethylamino)-4''(methylamino)trityl alcohol Component 1 : C39H23ClCrN7O12S.2Na Component 2: C46H30CrN10O20S2.3Na	Usage Ban (Under 30ppm each)	DIN 54231: 2022
	Dioxins & Furans		
1746-01-6 40321-76-4 51207-31-9 57117-31-4 39227-28-6 19408-74-3 57653-85-7 57117-41-6 70648-26-9 72918-21-9 57117-44-9 60851-34-5 35822-46-9 3268-87-9 67562-39-4 55673-89-7 39001-02-0 50585-41-6 109333-34-8 67933-57-7 131166-92-2 110999-44-5 110999-46-7 110999-45-6 107555-93-1	Group 1: 2,3,7,8-Tetrachlorodibenzo-p-dioxin 1,2,3,7, 8-Pentachlorodibenzo-p-dioxin 2,3,7,8-Tetrachlorodibenzofuran 2,3,4,7,8-Pentachlorodibenzofuran Group 2: 1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin 1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin 1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin 1,2,3,7,8-pentachlorodibenzofuran 1,2,3,4,7,8-Hexachlorodibenzofuran 1,2,3,7,8,9-Hexachlorodibenzofuran 1,2,3,6,7,8-Hexachlorodibenzofuran 2,3,4,6,7,8-Hexachlorodibenzofuran Group 3: 1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin 1,2,3,4,6,7,8,9-Octachlorodibenzo-p-dioxin 1,2,3,4,6,7,8-Heptachlorodibenzofuran 1,2,3,4,7,8,9-Heptachlorodibenzofuran 1,2,3,4,6,7,8,9-Octachlorodibenzofuran Group 4: 2,3,7,8-Tetrabromodibenzo-p-dioxin 1,2,3,7,8-Pentabromodibenzo-p-dioxin 2,3,7,8-Tetrabromodibenzofuran 2,3,4,7,8-Pentabromodibenzofuran Group 5: 1,2,3,4,7,8-Hexabromodibenzo-p-dioxin 1,2,3,7,8,9-Hexabromodibenzo-p-dioxin 1,2,3,6,7,8-Hexabromodibenzo-p-dioxin 1,2,3,7,8-Pentabromodibenzofuran	Sum of Group 1: 1 µg/kg Sum of Group 1 & 2: 5µg/kg Sum of Group 1, 2 & 3: 100 µg/kg Sum of Group 4: 1 µg/kg Sum of Group 4 & 5: 5 µg/kg	US EPA 8290 – (industry practice – not specified by the regulation)
	Flame Retardants (21 kinds)		
85535-84-8 85535-85-9 84852-53-9 59536-65-1 25637-99-4 3194-55-6 134237-50-6 134237-51-7 134237-52-8 32534-81-9 32536-52-0	Short-chain Chlorinated paraffins (SCCPs, C10 – C13) Medium-chain Chlorinated Paraffins (MCCPs, C14 – C17) Decabromodiphenyl ethane (DBDPE) Polybrominated biphenyls (PBB) Hexabromocyclododecane (HBCDD) and all major diastereoisomers identified: Hexabromocyclododecane (HBCDD) Alpha-hexabromocyclododecane Beta-hexabromocyclododecane Gamma-hexabromocyclododecane Penta-bromodiphenyl ether (PentaBDE) Octa-bromodiphenyl ether (OctaBDE)	Usage ban (under 1,000 ppm for SCCP and MCCP; others under 5ppm each)	Align with AFIRM

CAS NO.	Restricted Substance	Brooks Limit	Test Method and Comments
Various 126-72-7 5412-25-9 545-55-1 1163-19-5 115-96-8 79-94-7 3296-90-0 13674-87-8 25155-23-1	All other Polybrominated diphenyl ethers (PBDEs) Tris (2,3-dibromopropyl) phosphate (TRIS) Bis (2,3-dibromopropyl) phosphate (BDBPP) Tris (1-aziridinyl)-phosphine oxide (TEPA) Decabromodiphenyl ether (DecaBDE) Tris (2-chloroethyl) phosphate (TCEP) Tetrabromobisphenol A (TBBP A) 2,2-bis(bromomethyl)-1,3-propanediol (BBMP) Tris(1,3-dichloro-isopropyl) phosphate (TDCPP) Trixylyl phosphate (TXP)	Usage ban (under 1,000 ppm for SCCP and MCCP; others under 5ppm each)	Align with AFIRM
	Fluorinated Greenhouse Gases		
Various	See Regulation (EU) No 517/2014 for a complete list	Usage ban (under 0.1ppm)	Align with AFIRM - Headspace GC-MS
	Formaldehyde		
50-00-0	Formaldehyde	75ppm	Align with AFIRM
	Total Metals (4 kinds)		
 7439-92-1 7440-43-9 7439-97-6 7440-38-2	 Lead Cadmium Mercury Arsenic	Usage Ban under Pb 40ppm Cd 40ppm Hg 0.5ppm As 100ppm	Align with AFIRM
	Extractable Metals (11 kinds)		
 7439-92-1 7440-43-9 7439-97-6 7440-36-0 7440-38-2 7440-39-3 7440-50-8 7440-47-3 7440-48-4 18540-29-9 7782-49-2 7440-02-0	 Lead Cadmium Mercury Antimony Arsenic Barium (Ba) Copper Chromium (for textile) Cobalt Chromium VI (for textile) Selenium Nickel (Ni)	Usage Ban under Lead (Pb) 0.2ppm Cadmium (Cd) 0.1ppm Mercury (Hg) 0.02ppm Antimony (Sb) 30ppm Arsenic (As) 0.2ppm Barium (Ba) 1000ppm Copper (Cu) 25ppm Chromium (Cr) 1ppm Cobalt (Co) 4ppm Chromium VI (Cr VI) 1ppm Selenium (Se) 500ppm Nickel (Ni) 1ppm	Align with AFIRM
18540-29-9	Chromium VI (for leather)	Usage Ban (Under 3ppm)	ISO 10195:2018 method A2 for Aging, EN ISO 17075-1: 2017/17075-2: 2017
7440-02-0	Nickel - Release	Usage Ban (Under 0.5 µg/cm2/week)	EN 12472:2020 and EN1811:2023
	Monomers		
100-42-5	Styrene, Free	500ppm	Align with AFIRM
75-01-4	Vinyl Chloride	Usage Ban (Under 1ppm)	EN ISO 6401:2022
	Nitrosamines (9 kinds)		
62-75-9 55-18-5 621-64-7 924-16-3 100-75-4 930-55-2 59-89-2 614-00-6 612-64-6	N-nitrosodimethylamine (NDMA) N-nitrosodiethylamine (NDEA) N-nitrosodipropylamine (NDPA) N-nitrosodibutylamine (NDBA) N-nitrosopiperidine (NPIP) N-nitrosopyrrolidine (NPYR) N-nitrosomorpholine (NMOR) N-nitroso N-methyl N-phenylamine (NMPhA) N-nitroso N-ethyl N-phenylamine (NEPhA)	0.5 ppm each	Align with AFIRM
	Organotin Compounds (19 kinds)		
Various Various Various Various Various Various Various Various Various Various Various Various Various	Dibutyltin (DBT) Dioctyltin (DOT) Monobutyltin (MBT) Monooctyltin (MOT) Tricyclohexyltin (TCyHT) Trimethyltin (TMT) Trioctyltin (TOT) Tripropyltin (TPT) Dimethyltin (DMT) Diphenyltin (DPhT) Dipropyltin (DPT) Monomethyltin (MMT) Monophenyltin (MPhT)		Align with AFIRM

CAS NO.	Restricted Substance	Brooks Limit	Test Method and Comments
1461-25-2 597-64-8 3590-84-9 Various Various 56-35-9	Tetrabutyltin (TeBT) Tetraethyltin (TeET) Tetraoctyltin (TeOT) Tributyltin (TBT) Triphenyltin (TPhT) Bis(tributyltin) oxide (TBTO)	Usage ban (under 500ppm for TBTO, under 0.5ppm each for green highlight, under 1ppm each for others)	
	Ortho-phenylphenol		
90-43-7	o-Phenylphenol (o-PP)	1000ppm	EN 17134-2:2023
	Ozone-depleting Substances		
Various	See Regulation (EC) No 1005/2009 for a complete list	Usage Ban (Under 5ppm)	Align with AFIRM
Various	See Regulation (EC) No 1005/2009 for a complete list	Usage Ban (Under 5ppm)	Align with AFIRM
	Per- and Polyfluoroalkyl Substances (PFAS)		
	All PFAS as measured by total organic Fluorine	100 ppm by 2025, 50 ppm by 2027 (Under 20 ppm)	Align with AFIRM
1763-23-1 2795-39-3 29457-72-5 29081-56-9 70225-14-8 56773-42-3 251099-16-8 4151-50-2 31506-32-8 1691-99-2 2448-09-7 307-35-7 754-91-6	**PFOS and related substances** Perfluorooctanesulfonic acid (PFOS) Perfluorooctanesulfonic acid, potassium salt (PFOS-K) Perfluorooctanesulfonic acid, lithium salt (PFOS-Li) Perfluorooctanesulfonic acid, ammonium salt (PFOS-NH4) Perfluorooctane sulfonate diethanolamine salt (PFOS-NH(OH)2) Perfluorooctanesulfonic acid, tetraethylammonium salt (PFOS-N(C2H5)4) Didecyldimethyl ammonium perfluorooctane sulfonate (PFOS-N(C10H21)2(CH3)2) N-Ethylperfluoro-1-octanesulfonamide (N-Et-FOSA) N-Methylperfluoro-1-octanesulfonamide (N-Me-FOSA) 2-(N-Ethylperfluoro-1-octanesulfonamido)-ethanol (N-Et-FOSE) 2-(N-Methylperfluoro-1-octanesulfonamido)-ethanol (N-Me-FOSE) Perfluoro-1-octanesulfonyl fluoride (POSF) Perfluorooctane sulfonamide (PFOSA)	Usage Ban (Under 1 µg/m2)	Align with AFIRM
335-67-1 335-95-5 2395-00-8 335-93-3 335-66-0 3825-26-1	**PFOA (Perfluorooctanoic acid) and its salts** Perfluorooctanoic acid (PFOA) Sodium perfluorooctanoate (PFOA-Na) Potassium perfluorooctanoate (PFOA-K) Silver perfluorooctanoate (PFOA-Ag) Perfluorooctanoyl fluoride (PFOA-F) Ammonium pentadecafluorooctanoate (APFO)	Usage Ban (Under 25ppb)	
39108-34-4 376-27-2 3108-24-5 678-39-7 27905-45-9 1996-88-9 27854-31-5	**PFOA-related substances** 1H, 1H, 2H, 2H-Perfluorodecanesulfonic acid (8:2 FTS) Methyl perfluorooctanoate (Me-PFOA) Ethyl perfluorooctanoate (Et-PFOA) 2-Perfluorooctylethanol (8:2 FTOH) 1H, 1H, 2H, 2H-Perfluorodecyl acylate (8:2 FTA) 1H, 1H, 2H, 2H-Perfluorodecyl methacrylate (8:2 FTMA) 2H, 2H-Perfluorodecanoic acid (H2PFDA)	Usage Ban (Under 1,000 ppb)	
355-46-4 3871-99-6 55120-77-9 68259-08-5 82382-12-5	**PFHxS and its Salts** Perfluorohexane Sulfonic acid (PFHxS) Perfluorohexane Sulfonic acid, potassium salt (PFHxS-K) Perfluorohexane Sulfonic acid, lithium salt (PFHxS-Li) Perfluorohexane Sulfonic acid, ammonium salt (PFHxS-NH4) Perfluorohexane Sulfonic acid, sodium salt (PFHxS-Na)	Usage Ban (Under 25 ppb)	Align with AFIRM
68259-15-4 41997-13-1	**PFHxS-related Substances** N-Methylperfluoro-1-hexanesulfonamide (N-Me-FHxSA) Perfluorohexane sulfonamide (PFHxSA)	Usage Ban (Under 1,000 ppb)	Align with AFIRM

CAS NO.	Restricted Substance	Brooks Limit	Test Method and Comments
375-95-1 335-76-2 2058-94-8 307-55-1 72629-94-8 376-06-7 172155-07-6	**C9 – C14 PFCAs and Their Salts** Perfluorononanoic Acid (PFNA, C9-PFCA) Perfluorodecanoic Acid (PFDA, C10-PFCA) Perfluoroundecanoic Acid (PFUnA, C11-PFCA) Perfluorododecanoic Acid (PFDoA, C12-PFCA) Perfluorotridecanoic Acid (PFTrDA, C13-PFCA) Perfluorotetradecanoic Acid (PFTeDA, C14-PFCA) Perfluoro-3-7-dimethyloctanecarboxylate (PF-3,7-DMOA)	Usage Ban (Under 25 ppb)	Align with AFIRM
17741-60-5 2144-54-9 865-86-1 34598-33-9 678-39-7 39239-77-5 120226-60-0 2043-54-1 30046-31-2	**C9 – C14 PFCA-related Substances** 1H, 1H, 2H, 2H-Perfluorododecyl acylate (10:2 FTA) 1H, 1H, 2H, 2H-Perfluorododecyl methacrylate (10:2 FTMA) 1H, 1H, 2H, 2H-Perfluorododecanol (10:2 FTOH) 2H, 2H,3H, 3H- Perfluoroundecanoic acid (H4PFUnA) Perfluorocylethanol 8:2 (8:2 FTOH) 1H, 1H, 2H, 2H-Perfluorotetradecan-1-ol (12:2 FTOH) 1H, 1H, 2H, 2H-Perfluorodecanesulphonic acid (10:2 FTS) 1H, 1H, 2H, 2H-Perfluorododecyl iodide (10:2 FTI) 1H, 1H, 2H, 2H-Perfulorotetradecyl iodide (12:2 FTI)	Usage Ban (Under 260 ppb)	Align with AFIRM
307-24-4 27619-97-2 647-42-7	**PFHxA, Its Salts, and Related Substances** Perfluorohexanotic Acid (PFHxA, C6-PFCA) 1H, 1H, 2H, 2H-Perfluorooctanesulfonic acid (6:2 FTS) 1H, 1H, 2H, 2H-Perfluorooctanol (6:2 FTOH)	Usage Ban (Under 25 ppb for PFHxA and its salts, 1,000ppb for PFHxA-related substances)	Align with AFIRM
	Pesticides (76 kinds)		
Various	Align with AFIRM RSL www.afirm-group.com/afirm.rsl	Usage ban (under 0.5ppm each)	Align with AFIRM
	Phthalates (25 kinds)		
28553-12-0 117-81-7 117-84-0 26761-40-0 85-68-7 84-74-2 84-75-3 84-69-5 68515-42-4 71888-89-6 117-82-8 605-50-5 131-16-8 776297-69-9 84-66-2 131-11-3 131-18-0 84777-06-0 68515-50-4 84-61-7 27554-26-3 71850-09-4 68648-93-1 68515-51-5 26040-51-7	Di-isononyl phthalate (DINP) Di(2-ethylhexyl) phthalate (DEHP) Di-n-octyl phthalate (DNOP) Di-iso-decyl phthalate (DIDP) Butyl benzyl phthalate (BBP) Dibutyl phthalate (DBP) Di-n-hexyl phthalate (DnHP) Diisobutyl Phthalate (DIBP) 1,2-Benzenedicarboxylic acid, di-C7-11-branched and linear alkyl esters (DHNUP) 1,2-Benzenedicarboxylic acid, di-C6-8-branched alkyl esters, C7-rich (DIHP) Bis(2-methoxyethyl) phthalate (DMEP) Diisopentyl phthalate (DIPP) Dipropyl phthalate (DPRP) N-pentyl-isopentylphthalate (nPIPP) Diethyl phthalate (DEP) Dimethyl phthalate (DMP) Di-n-pentyl phthalate (DPP) 1,2-Benzenedicar boxylic acid, dipentylester, branched and linear 1,2-Benzenedicarboxylic acid, dihexyl ester, branched and linear Dicyclohexyl phthalate (DCHP) Diisooctyl Phthalates (DIOP) Diisohexyl Phthalate (DIHxP) 1,2-benzenedicarboxylic acid, di-C6-10-alkyl esters or mixed decyl and hexyl and octyl diesters with ≥ 0.3% of dihexyl phthalate 1,2-Benzenedicarboxylic acid, mixed decyl and hexyl and octyl diesters 1,2-Benzenedicarboxylic acid, di-C6-10-alkyl esters Bis(2-ethylhexyl) tetrabromophthalate	500ppm each Total 1,000ppm	GC-MS analysis CPSC-CH-C1001-09.4

CAS NO.	Restricted Substance	Brooks Limit	Test Method and Comments
	PAHs (Polycyclic Aromatic Hydrocarbons) (18 kinds)		
56-55-3 50-32-8 205-99-2 192-97-2 205-82-3 207-08-9 218-01-9 53-70-3 191-24-2 193-39-5 91-20-3 83-32-9 208-96-8 120-12-7 206-44-0 86-73-7 85-01-8 129-00-0	Benzo(a)anthracene Benzo(a)pyrene Benzo(b)fluoranthene Benzo(e)pyrene (BeP) Benzo(j)fluoranthene(BjFA) Benzo(k)fluoranthene Chrysene Dibenz(a,h)anthracene Benzo(g,h,i)perylene Indeno(1,2,3-cd)pyrene Naphthalene Acenaphthene Acenaphthylene Anthracene Fluoranthene Fluorene Phenanthrene Pyrene	1 ppm each for yellow highlight 10.0ppm for sum of 18 PAHs	AFPS GS 2019 or EN 17132:2019 or ISO 16190:2021
	Polyvinyl Chloride		
9002-86-2	Polyvinyl Chloride (PVC)	Usage Ban (Not Detected)	Beilstein test plus Fourier Transform-Infrared Spectroscopy
	Volatile Organics (29 kinds)		
75-12-7 68-12-2 127-19-5 872-50-4 75-15-0 108-94-1 71-43-2 100-41-4 108-95-2 108-88-3 75-35-4 79-01-6 127-18-4 95-48-7 108-39-4 106-44-5 1330-20-7 95-47-6 108-38-3 106-42-3 75-09-2 67-66-3 56-23-5 107-06-2 71-55-6 79-00-5 630-20-6 79-34-5 76-01-7	Formamide Dimethyl formamide (DMFa) Dimethylacetamide (DMAC) N-Methyl-2-pyrrolidone (NMP) Carbon Disulfide Cyclohexanone Benzene Ethylbenzene Phenol Toluene 1,1-Dichloroethylene Trichloroethylene Tetrachloroethylene (PERC) Cresol (Methylphenole): o-cresol m-cresol, p-cresol Xylene: o-xylene m-xylene, p-xylene Dichloromethane Chloroform Carbon tetrachloride 1,2-Dichloroethane 1,1,1-Trichloroethane 1,1,2-Trichloroethane 1,1,1,2-Tetrachloroethane 1,1,2,2-Tetrachloroethane Pentachloroethane	200ppm for Formaldehyde 1ppm for Benzene 10ppm for Phenol 1000ppm for sum of VOCs For EVA, PU or TPU film, Synthetic leather, only check the yellow highlighted substances. For adhesive, primer, ink, please check all VOCs.	ISO/TS 16189 for highlighted parameters Headspace GC/MS for others
	UV Inhibitors (4 kinds)		
3846-71-7 3864-99-1 25973-55-1 36437-37-3	2-benzotriazol-2-yl-4,6-di-tert-butylphenol (UV 320) 2,4-Di-tert-butyl-6-(5-chlorobenzotriazole-2-yl) phenol (UV327) 2-(2H-benzotriazol-2-yl)-4,6-ditertpentylphenol (UV-328) 2-(2H-benzotriazol-2-yl)-4-(tert-butyl)-6-(sec-butyl) phenol (UV-350)	1,000ppm each	ISO 24040:2022 with extraction in THF, analysis by GC/MS
2440-22-4	Drometrizole	Align with AFIRM	

CAS NO.	Restricted Substance	Brooks Limit	Test Method and Comments
	Halogenated Biphenols, halogenated Terphenyls and halogenated Naphthalenes		
Various Various 1336-36-3 Various 61788-33-8	**Polybrominated Naphthalenes** **Polyborminated Terphenyls** **Polychlorinated Bisphenyls** **Polychlorinated Naphthalenes** **Polychlorinated Terphenyls**	Usage Ban (under 1ppm)	EN ISO 17881-1 (2016) for brominated compounds ISO/TR 17881-3 (2018) for chlorinated compounds
121-14-2	**2,4-Dinitrotoluene (DNT)**	1000ppm	Screening by GC-MS
91-22-5	**Quinoline**	50ppm	DIN 54231:2022
	pH value	Textile: 4.0 – 7.5 Leather: 3.5 – 5.5	Textile: EN ISO 3071:2020 Leather: EN ISO 4045: 2018
	Odor Odor test for components and finished products (not always required)	≤ Grade 2	SNV195 651

6. RESTRICTED SUBSTANCES TESTING PROCESS

6.1. Routine Tests

Suppliers must proactively implement RS test each year and send to Brooks. Materials need be identified by color, ingredient and production origin for RS testing via the Brooks Test Request Form (Appendix 4). Suppliers must arrange and pay for testing.

Section 7 of this RSL document, provides test guidelines by material category. Suppliers can arrange RS test according to material category. But some materials or components are complex. If suppliers can't identify testing package, please consult Brooks.

6.2. Random Tests

Brooks may randomly test materials, components or finished products at any stage of production.

6.3. Frequency of Testing

Material Type	Color	Minimum Required Frequency
All materials used in Brooks' product		Once per year
Mesh and PU	Neon and metallic colors	Each year or each season
	Base colors (including red, yellow, blue, black, white)	Once per year (note: the number of colors and tests can vary by supplier)
Polymers Formulation (rubber, EVA, TPU or other)	Neon or metallic colors	Each year or each season
	Primary Color (red, yellow, blue, white, black)	Once per year
Recycled outsole/midsole polymers		Consult with Brooks RS team.

6.4. Approved Testing Laboratories

All the tests must be done in a Brooks-approved testing laboratory, see Appendix 1.

6.5. Failed Tests

For any failed test, the Supplier must notify Brooks immediately and complete the Brooks Corrective Action Form (Appendix 2). The Corrective Action Plan must be implemented within one week. You must consult with Brooks to determine next steps. Even if you choose to re-test you must still report the failed test to Brooks immediately. Note: Brooks reserves the right to reject the material or all material from a supplier as a result of multiple failed tests.

7. TESTING MATRIX

The Testing Matrix identifies high risk parameters required for RS test according to material categories. Materials need to be in compliance with the whole Brooks RSL although some parameters are not requested for compulsory testing. All Brooks products must adhere to the requirement of the REACH Substances of Very High Concern (SVHC) and California Proposition 65 List, see Appendix 3.

7.1. Key Chemical Test List – Footwear

The following table provides test requirements for different material types used in Brooks footwear and identifies high risk parameters required to be tested.

Substances	Natural Fibers	Synthetic Fibers	Blends	Coating & Printing on textile/leather	Polymer (EVA, TPU, Foam)	Rubber	Natural Leather	Synthetic leather	Ink, Paint, Pigment	Adhesive, Solvent, Primer	Metal Items	Paper insole
Acetophenone & 2-Phenyl-2-Propanol (EVA only)					●							
AZO Dyes	●	●	●	●			●	●				
Bisphenols		●	●	●	●	●	●	●				
Disperse Dyes		●	●	●								
Carcinogenic Dyes	●	●	●	●			●	●				
Chlorophenols	●		●	●			●					●
Chlorinated Paraffins					●	●	●					
Total Metal				●	●	●	●	●	●		●	●
Nickel – Release											●	
Chromium VI							●					
Extractable Metal	●	●	●	●			●	●				
Formaldehyde	●	●	●	●	●		●	●	●	●		●
AP, APEO	●	●	●	●	●	●	●	●	●	●		
Organotin Compounds				●	●	●	●	●	●	●		
Phthalates				●	●	●		●	●	●		
Ph Value	●	●	●				●					
PVC				●	●							
Nitrosamines						●						
DMFu							●					
PAHs				●	●	●		●	●			
UV Inhibitors (Pu foam only)					●							
VOCs				●	●			●	●	●		
Total Fluorine & PFAS	○	○	○	○				○				

● Must be tested.
○ Only for water repellent functions.

7.2. Key Chemical Test List – Apparel

The following table provides test requirements for different material types used in Brooks apparel and identifies high risk parameters required to be tested.

Substances	Natural Fibers	Synthetic Fibers	Blends	Coating & Printing on Textile/Leather	Polymer (EVA, TPU, Foam, RB)	Natural Leather	Synthetic leather	Ink, Paint, Pigment	Metal Items
AZO Dyes	●	●	●	●		●	●		
Bisphenols		●	●	●	●	●	●		
Disperse Dyes		●	●	●					
Carcinogenic Dyes	●	●	●	●		●	●		
PCP/ TePC	●	●	●	●		●			
Pesticides	●		●						
Nickel – Release									●
Chromium VI						●			
Total Metal				●	●	●	●	●	●
Extractable Metals	●	●	●	●					
Formaldehyde	●	●	●	●		●	●	●	
AP, APEO	●	●	●	●	●	●	●	●	
Organotin Compounds	●	●	●	●	●	●	●	●	
Phthalates				●	●		●	●	
PVC				●	●				
VOCs				●	●		●	●	
Ph value	●	●	●			●	●		
Total Fluorine & PFAS	○	○	○				○		
Flame Retardants	○	○	○		○	○	○		

● Must be tested.

○ Only for water repellent functions or if the material is treated by flame retardants.

8. PACKAGING RESTRICTED SUBSTANCES REQUIREMENTS

Packaging includes, but is not limited to:

- Hand Tags
- Shoe Boxes
- Swifttachs
- Clamshells
- Labels (UPC, case lot and carton)
- Hangers
- Retail, Gift and Specialty Boxes
- Bags and Polybags
- Corrugated Cartons
- Shipping Pallets
- Slip Sheets
- Tissue Paper
- Foam
- Size Strips
- Inserts
- Tape

Anything used for the containment, protection, handling, delivery and presentation of goods, is considered packaging.

You are required to keep the following two documents on file for any packaging material you use, and you must be able to produce these to Brooks at any time upon our request:

1. Material Data Safety Sheet
2. RS Test Report

8.1. Testing Requirements

Before production begins, you are required to obtain third party RS testing of any new packaging material. After the first test, material should be re-tested at least every year. Retain copies of test results and be able to submit them to Brooks immediately upon request.

Paper Packaging needs to be tested: AP & APEO, Metal, Formaldehyde, Odor.

Plastic Packaging needs to be tested: Metal, Phthalates, Formaldehyde, BPA, BHT, PVC.

Packaging Ink, Painting & Coatings need to be tested: Align with Brooks RSL TESTING MATRIX

Water repellent function packaging needs to be tested: PFAS.

If the packaging material is with anti-molding, additional testing is required: Organotin, Dimethyl Fumarate

8.2. Packaging Restricted Substances List (PRSL)

CAS NO.	Restricted Substance	Brooks Limit	Test Method
Various	**Alkylphenols (APs), Alkylphenol Ethoxylates (APEOs) including all isomers**	Align with Brooks RSL	Align with Brooks RSL
Various	**AZO Dyes**	Align with Brooks RSL	Align with Brooks RSL
7439-92-1 7440-43-9 7439-97-6 18540-29-9	**Metals** Lead Cadmium Mercury Chromium VI	Total sum of all metals: 100ppm	Align with AFIRM
Various	**Phthalates**	**Align with Brooks RSL**	Align with Brooks RSL
9002-86-2	**(Polyvinyl Chloride) PVC**	Usage Ban	Align with Brooks RSL
80-05-7	**Bis-phenol A (BPA)**	Usage Ban (Under 1ppm)	Align with Brooks RSL
128-37-0	**Butylhydroxytoluine (BHT)**	Usage Ban (Under 25ppm)	ASTM D4275
50-00-0	**Formaldehyde**	75ppm	Align with Brooks RSL
624-49-7	**Dimethyl Fumarate**	Usage Ban (Under 0.1ppm)	Align with Brooks RSL
Various	**Organotin Compounds**	Align with Brooks RSL	Align with Brooks RSL
Various	**PFAS**	Align with Brooks RSL	Align with Brooks RSL
	Odor test	≤ Grade 2	SNV195 651

APPENDIX 1: APPROVED LABORATORIES FOR RESTRICTED SUBSTANCES TESTING

Use only the listed Brooks-approved laboratories for third party RS testing. Retain all test results and upon request, immediately produce test results to Brooks. All approved testing laboratories (Intertek, SGS, BV, TUV, CTI) are global testing houses. They have different labs or branches in different countries. If you want to use a lab not listed, Please contact: Victor.Song@Brooksrunning.com .

Lab	Address	Contact
Intertek - GZ	Intertek Testing Services Shenzhen Ltd. Guangzhou Branch. Room 601, No.8, East BaoYing Road, Huangpu District, Guangzhou 510730	Cici Jian Cici.jian@intertek.com 86-20-28209278
Intertek - Vietnam	Intertek Vietnam, 8th floor of Lobby D at S.O.H.O Biz Office Building No 38 Huynh Lan Khanh St., Ward 2, Tan Binh District, HCM City	Thanh NQ Nguyen thanh.nq.nguyen@intertek.com Hongnhung Nguyen Hongnhung.nguyen@intertek.com Chi Nguyen Chi.nguyen@intertek.com Tel: 84-28 62971099-ext 172
Intertek TW	10F No.423, Ruiguang Rd., Neihu Dist., Taipei 114690, Taiwan	Josephine Chang Josephine.chang@intertek.com 886-2-66022216 Limei Chu Limei.chu@intertek.com 886-2-66022675
Intertek Indonesia	PT. Intertek Utama Service, Citrabuana Indoloka Building, JI. Cikini IV No. 2, DKI Jakarta 10330	Angga Dwi Putra Angga.putra@intertek.com Tel: 6221-3918586, 62856 59209708
CTI - SZ	Centre Testing International Corporation, F5, CTI Building, No.4, Liuxian 3rd Road, Xin'an Street, Bao'an Dis Shenzhen, P.R. China, 518101	Simon Simon.peng@cti-cert.com Tel:86-755-33683434; Merry Merry.Lan@cti-cert.com Tel: 86-755-33681919
TUV - GZ	TUV China 5F, Communication Building, 163 Pingyun Rd, Huangpu Ave. West Guangzhou 510656 P.R. China	Jay Jay.guo@tuvsud.com Tel: 86-20-38153468
TUV - Vietnam	TUV SUD Vietnam Lot III-26, 19/5A Street, Tan Binh Industrial Park, Tay Thanh Ward, Tan Phu District, HCMC, Vietnam	Kieu Nguyen Thuykieu.nguyenthi@tuvsud.com Tel: 84-28-62678507 (ext. 107), 84-902287697
BV - China	1F, No. 183, Shi Nan Road, Mei Lin Plaza Block B, Dong Chong, Nan Sha, Guang Zhou, Guang Dong, China 511453	Jay Mao Jay.Mao@bureauveritas.com Tel: 86-20-22902088-188, 86-13711625757, 86-18022362020 Jojo Li Jojo.Li@bureauveritas.com Tel: 86-20-22902088-334, 86-13318816790
BV - Vietnam	Lot C7-C9, Cat Lai Industrial Zone, Thanh My Loi Ward, Thu Duc City, HCMC Vietnam	Kiara Nguyen Kiara.Nguyen@bureauveritas.com 0981657077
SGS - HK	SGS Hong Kong Ltd. 4/F On Wui Centre, 25 Lok Yip Road, Fanling, N.T., Hong Kong, China	Sarah Wang Sarah-sh.wang@sgs.com Tel: 852-60182983

Lab	Address	Contact
SGS - GZ	198 Kezhu Road, Scientech Park, Guangzhou Economic & Technology Development District, Guangzhou, China 510663	Sophia Sun Sophia.sun@sgs.com Tel: 86-20-32136617
SGS – Vietnam (Ho Chi Minh Lab)	Lot III/21, 19/5A Street, Industrial Group III, Tan Binh Industrial Zone, Tay Thanh Ward, Tan Phu District, Ho Chi Minh City, Vietnam	Ngan Bui Nga.bui@sgs.com Tel: 84-28 38160999 (ext.655)
SGS – Vietnam (Hai Phong Lab)	Workshop X11, Hai Thanh workshop area, Hai Thanh Ward, Duong Kinh District, Hai Phong City, Vietnam	Trang Nguyen Trang.nguyen3@sgs.com +84 (0)2253 660 396 Ext 272
SGS - Indonesia	The Garden Centre 1ST and 2nd Floor – Cilandak Commercial Estate JI. Raya Cilandak KKO, Jakarta 12560 Indonesia	Fitria Handayaningsih Fitria.handayaningsih@sgs.com 62-021-29780600 62-81196206394
SGS - TW	SGS Taiwan Ltd. (Apparel) 31, Wu Chyuan Road, New Taipei Industrial Park, Wu Ku Dist, New Taipei City 248016, Taiwan	Tina Chou Tina.Chou@sgs.com 886-2-22993279 Ext. 5209
	SGS Taiwan Ltd. (Footwear) No.61 Kai-Fa Rd., Nanzih Dist., Kaohsiung 81170, Taiwan	Janny Lin Janny.lin@sgs.com 886-7-3012121 Ext. 4102

APPENDIX 2: BROOKS RSL CORRECTIVE ACTION FORM

Supplier Name & address:	Material/Component/Product description:	Color tested:	Laboratory tested:
Contact person name, phone & email:	Test Report No & Date tested:	Failure parameter & result:	Brooks Requirements:
Factory Supplied to & Quantity Supplied:			

Why is this chemical used in your process?

Were you aware that this chemical was in the Brooks RSL?

What is your corrective action plan & schedule, including how to prevent failures in future, the material replacement or production process change to ensure Brooks RSL compliance?

Who will be responsible to manage the action plan and communicate back to Brooks, including material vendor and related factories?

Signature: Date:

Submit form to: victor.song@brooksrunning.com

By signing this form, the Supplier acknowledge that their material or process has been found to be non-compliant to Brooks RSL and that they will implement the documented corrective action. The Supplier is responsible for retesting costs to ensure the corrective action is being sustained.

APPENDIX 3: SUBSTANCES OF VERY HIGH CONCERN (SVHC) LIST

Brooks expects all suppliers to comply with all applicable laws of the countries in which we distribute Brooks products. Below we provide a reference guide of certain laws and guidelines, but we do not represent that this is an exhaustive list. You are responsible for knowing the laws and regulations about the manufacturing and production processes you use.

- REACH SVHC: http://echa.europa.eu/web/guest/candidate-list-table
- Prop 65 and applicable consent decrees (footwear & apparel)

APPENDIX 4: BROOKS TEST REQUEST

Test Lab:		**Submit Date:**
☐ Footwear	☐ Accessory & gear	☐ Apparel
Supplier Information		
Vendor Name:		
Supplier Address:		
Contact Person:		Email:
TEL:		FAX:
Invoice to:		
Sample Information		
Sample Description:		Color:
Finished Product Factory Name:		
Product Category ☐ Adults ☐ Kids		
Testing Information (Material Test Package)		
☐ Natural Fibers	☐ Synthetic Fibers	☐ Blends
☐ Polymer	☐ Rubber	☐ Natural Leather
☐ Synthetic Leather	☐ Ink, Paint & Pigment	☐ Chemical, Solvent adhesive & Primer
☐ Paper Insole	☐ Packaging	☐ Coating & Printed Textile
Testing Information (Individual Test)		
☐ AZO Dyes	☐ Disperse/Carcinogenic Dyes	☐ Ph Value
☐ PCP/TePC	☐ Total Metals	☐ Extractable Metals
☐ Chromium VI	☐ Nickel - Release	☐ DMFu
☐ Formaldehyde	☐ AP, APEO	☐ Organotin Compounds
☐ Phthalates	☐ PVC	☐ Nitrosamines
☐ Pesticides	☐ PAHs	☐ VOCs
☐ PFAS	☐ Flame Retardants	☐ Acetophenone
☐ Total Organic Fluorine	☐ BPA	☐ 2-phenyl-2-propanol
Test Type: ☐ First Test ☐ Retest (Previous Report No.:)		
Service Requested (Working days start at sample receipt) ☐ Regular: 5 working days ☐ Express: 3 working days (surcharge)	**Remark:** All test reports should be copied to Victor.song@brooksrunning.com	