



The Burton Corporation Supply Chain Sustainability Policies and Standards

Table of Contents

PART I: BURTON SUPPLY CHAIN SUSTAINABILITY COMMITMENT	3
PART II: STANDARDS	4
1. CODE OF CONDUCT 3.0	4
2. RESTRICTED SUBSTANCES LIST	5
3. SUSTAINABILITY MONITORING POLICY	6
3.1. SOCIAL AND ENVIRONMENTAL RESPONSIBILITY AUDIT PROGRAM	6
3.2. CHEMICALS MANAGEMENT MONITORING PROGRAM	11
PART III: GUIDANCE ON CERTAIN CHEMISTRY AND REGULATIONS	14
4.1 PRINTING PROCESSES AND INKS	14
4.2 METAL PARTS AND FINISHES ON METAL PARTS	14
4.3 PHTHALATES	15
4.4 LEAD IN PAINTS, SUBSTRATES, AND SURFACE COATINGS	15
4.5 THE REGISTRATION, EVALUATION, AUTHORIZATION, AND RESTRICTION OF CHEMICALS (“REACH”)	15
4.6 PROPOSITION 65 OF THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986	15
4.7 THE CONSUMER PRODUCT SAFETY ACT (“CPSA”), THE CONSUMER PRODUCT SAFETY IMPROVEMENT ACT (“CPSIA”), AND THE CANADA CONSUMER PRODUCT SAFETY ACT (“CCPSA”)	15
4.8 USE OF BIOCIDES AND PESTICIDES	16
4.9 PRODUCTS AND MATERIALS INTENDED TO HAVE CONTACT WITH FOOD	16
LIST OF ATTACHMENTS	17

Part I: Burton Supply Chain Sustainability Commitment

The Burton Corporation (“Burton”), including its wholly owned brands, is committed to operating in a responsible manner to improve our impact on the environment and all of the people and communities that we touch. Our commitment is based on the values defined in our Stance and is also shaped by externalities such as global and local regulations.

In addition to improving our direct impact, we are also committed to ensuring that our entire supply chain mirrors these values and commitments. Burton has established standards regarding social and environmental responsibility and chemicals management. All Burton business partners, suppliers, agents, and designated third parties shall adhere to the following Burton standards (collectively, the “Standards”): the Code of Conduct, the Restricted Substances List (“RSL”), and the Sustainability Monitoring Policy.

As a Burton partner, you are required to adhere to the latest versions, which are maintained at <http://vendor.burton.com>. In addition to your own manufacturing, it is your responsibility to provide these Standards to your supply chain so that they in turn are also aligned with these critical requirements. We expect that all purchases that you make on our behalf explicitly reference and comply with the Standards. Whether Burton enters into or continues a business relationship with a particular vendor depends on the vendor’s commitment to and demonstration of compliance with the Standards.

CODE OF CONDUCT

While Burton recognizes that there are different legal and cultural environments in which facilities operate throughout the world, the Burton Code of Conduct outlines the core rules and responsibilities that all of our vendors, suppliers, and associated facilities must follow. Burton is a member of the Fair Labor Association (“FLA”) and has adopted the FLA Code of Conduct. In addition, the Burton Code of Conduct is based on the International Labor Organization’s (“ILO”) core labor standards, and requires compliance with the country laws where facilities operate. Burton prefers that its business partners strive to *exceed* the responsibilities outlined by the Burton Code of Conduct by creating sustainable solutions, and implementing best practices and continuous improvement throughout all of their facilities.

RESTRICTED SUBSTANCES LIST (“RSL”)

Burton recognizes that suppliers are critical partners in our effort to manufacture responsible and sustainable products. We expect that all products and materials meet the most rigorous consumer safety standards, and are in compliance with all applicable product, packaging, and environmental, health and safety (“EHS”) policies and regulations. To support this objective, we partnered with bluesign® Technologies and published an RSL that applies to all chemicals, raw materials, components, finished products, and packaging used by the entire manufacturing supply chain for Burton products.

SUSTAINABILITY MONITORING POLICY

The Sustainability Monitoring Policy sets forth the requirements that all facilities and suppliers must meet in order to do business with Burton, including regular audits and remediation.

We thank you for your cooperation in this partnership. Please contact sustainability@burton.com with any questions.

Part II: Standards

1. CODE OF CONDUCT 3.0

Preamble:

At Burton, we are committed to:

- A standard of excellence in every aspect of our business and in every corner of the world;
- Ethical and responsible conduct in all of our operations;
- Respect for the rights of all individuals; and
- Respect for the environment.

We expect these same commitments to be shared by all suppliers and manufacturers of Burton products. Violations of the Burton Code of Conduct will be appropriately remediated at the cost of the supplier or manufacturer. Failure to comply with the Burton Code of Conduct may ultimately result in termination of the relationship between Burton and the supplier or manufacturer, including termination of any manufacturing, sourcing, agent, and/or license agreement.

Suppliers and manufacturers shall comply with all laws and regulations in all locations where they conduct business. When differences or conflicts in standards arise, the highest standard shall apply. *At a minimum*, Burton requires all suppliers and manufacturers to meet the following standards:

CODE ELEMENT	DESCRIPTION
EMPLOYMENT RELATIONSHIP	Employers shall adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national and international labor and social security laws and regulations.
NONDISCRIMINATION	No person shall be subject to any discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group or ethnic origin.
HARASSMENT OR ABUSE	Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological, or verbal harassment or abuse.
FORCED LABOR	There shall be no use of forced labor, including prison labor, indentured labor, bonded labor or other forms of forced labor.
CHILD LABOR	No person shall be employed under the age of 15 or under the age for completion of compulsory education, whichever is higher.
FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING	Employers shall recognize and respect the right of employees to freedom of association and collective bargaining.
HEALTH, SAFETY, AND ENVIRONMENT	Employers shall provide a safe and healthy workplace setting to prevent accidents and injury arising out of, linked with, or occurring in the course of work or as a result of the operation of employers' facilities. Employers shall adopt responsible measures to mitigate negative impacts that the workplace has on the environment.
HOURS OF WORK	Employers shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours. Employers shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Employers shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.
COMPENSATION	Every worker has a right to compensation for a regular work week that is sufficient to meet the workers' basic needs and provide some discretionary income. Employers shall pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract. Where compensation does not meet workers' basic needs and provide some discretionary income, each employer shall work with Burton to take appropriate actions that seek to progressively realize a level of compensation that does.

2. RESTRICTED SUBSTANCES LIST (“RSL”)

Burton has partnered with bluesign® Technologies and published an RSL that applies to all raw materials, parts, trims, components, hardware, chemicals, mixtures, coatings, and other items supplied to Burton and/or used in the manufacture of finished goods and packaging. See Attachment B. It is required that suppliers implement input-stream chemicals management systems in order to know and address chemical component input, sourcing, sampling, and testing of materials used in our products and packaging in order to meet the requirements of the RSL. Burton suppliers shall impose these requirements upon their suppliers, and sub-suppliers in turn, to ensure alignment through the entire supply chain.

The global laws and regulations that we all must abide by are constantly changing. As such, Burton’s requirements will continue to evolve in order to keep pace with changing regulations. At a minimum, we expect our RSL to be updated annually. Vendors are required to have appropriate programs and resources in place in order to align themselves and their suppliers to the most up-to-date versions of these requirements and applicable regulations.

Burton monitors supplier compliance with the RSL, as outlined below in 3.2. Chemicals Management Monitoring Program. For additional guidance on chemicals management and EHS, see Part III: Guidance on Certain Chemistry and Regulations, and Attachments C and D.

The RSL is a subset of testable substances extracted from the bluesign® System Substances List (“BSSL”), which is a larger, comprehensive list that includes global substance restrictions beyond finished products. Burton strongly encourages all suppliers to also align with the BSSL.

3. SUSTAINABILITY MONITORING POLICY

Burton's Sustainability Monitoring Policy aims to improve our social and environmental impacts in the communities in which we conduct business throughout the world. This Policy applies to all facilities that produce goods for Burton or any of its subsidiaries, brands, or affiliates, including Burton, Anon, and Channel Islands. This Policy sets forth the basic requirements that all facilities must meet in order to do business with Burton.

Burton monitors facilities involved in the manufacturing of Burton branded products and products for brands which Burton is licensed to produce. Monitoring occurs for all finished goods facilities and may also occur for raw material suppliers. Monitoring includes, but is not limited to, facility audits conducted by a Burton employed auditor or by an accredited third-party audit company nominated by Burton. Following an initial audit, Burton may audit a facility at any time, either announced or unannounced.

Burton uses sustainability monitoring results as an integral part of its supply chain strategy, influencing how we rate, select, and develop vendor partnerships.

3.1. SOCIAL AND ENVIRONMENTAL RESPONSIBILITY AUDIT PROGRAM

The Social and Environmental Responsibility Audit is conducted to verify supplier facility compliance with the FLA Workplace Code of Conduct and Compliance Benchmarks. See Attachment A. Burton also requires suppliers to maintain a complete and up-to-date list of the local, national, and international laws applicable to operations, occupational health and safety, and environmental impacts (discharge, emissions, and disposal), which is verified during the audit.

All vendors and agents must provide full disclosure of facilities and subcontractors that are used for Burton production. Changes or additions to facilities or subcontractors must be identified in writing to the Burton Sustainability Team at least six (6) weeks prior to the anticipated start of production. On average, it will take six (6) weeks to schedule and execute an initial facility audit. Inquiries and requests can be made by e-mailing: sustainability@burton.com.

At Burton's discretion, audits will be conducted regularly for every facility. The initial audit will be paid for by the manufacturer and scheduled by Burton. All agents that change production facilities are liable to pay for an initial audit to approve any new facility prior to starting production. Burton utilizes an audit result scoring system. If a facility scores "Gold" on an audit, the highest rating, then Burton will pay for follow-up monitoring. However, all follow-up monitoring costs will be the responsibility of the manufacturer for scores below "Gold."

Violations of this Policy will be remedied to Burton's satisfaction at the cost of the manufacturer. A violation of the above notice requirement and/or failure to receive Burton's prior approval of any subcontractor or facility shall result in the penalties set forth in Exhibit A, attached hereto and incorporated by reference. Burton also reserves the right to take necessary measures to ensure future compliance with this Sustainability Monitoring Policy. Failure to comply with this Policy may ultimately result in termination of the relationship between Burton and the manufacturer, including termination of any manufacturing and license agreements, and/or outstanding purchase orders. Facilities that deny entry to auditors or Burton employees, manipulate or obstruct audits, or cancel a confirmed audit within a week (five business days) of the audit date will be charged Three Thousand and 00/100 Dollars (USD \$3,000.00) to cover audit fees, travel, and/or administrative expenses.

3.1.1 Audit and Follow-Up Process

- A typical audit will last six (6) to eight (8) hours including employee interviews, a facility tour, and documentation review. At the end of the audit, the facility manager will be presented with a written list of action items for any issues that have been found during the audit.

- Each facility will receive a rating, as outlined in the table below. All facilities are expected to meet a minimum passing score of 80, rating “Silver.” Any facility that receives a score of 79 or below will be responsible for continuous improvement, and corrective action shall be implemented until the passing score is met or the relationship is otherwise terminated.
- Burton will provide the facility with a Corrective Action Plan (“CAP”) and audit report within approximately seven business days of an audit. See Attachment I for example CAP.
- The CAP’s issues are defined and rated by the following degrees of severity:
 - Minor** – A finding that represents low risk to worker safety or the environment.
 - Moderate** – A finding that may breach a code item but is an occasional or isolated issue and represents risk to worker safety or the environment.
 - Major** – A finding that may breach a code item or local law and represents significant risk to worker safety, human rights, or the environment.
 - Zero Tolerance** – A non-tolerant finding, which may result in termination of orders with the facility. A significant finding that breaches a code issue or local law and may present a danger to worker safety, human rights, or the environment. Examples of this include child labor, forced/prison labor, life threatening conditions, abuse or harassment, or bribery.
- The facility is required to fill out and return the CAP to Burton within ten (10) business days of receipt.
- The Burton CAP requires the facility to build a root cause analysis of each of the issues found during the audit. The facility is also required to provide Burton with photos and/or documents that serve as evidence of issue correction.
- Burton will review the facility’s response to the CAP within approximately two (2) business days of receiving it and will provide feedback to the facility.
- All “Zero Tolerance” issues must be resolved within 24 hours of completion of the original facility audit.
- *Corrective Action is an ongoing process until all issues are resolved or the relationship is otherwise terminated.*

3.1.2 Audit Ratings

Rating	Score	Follow-Up Audit
Gold	90-100	24 months
Silver	80-89	18 months
Orange	71-79	12 months
Red	51-70	Within 9 months
Zero Tolerance	0-50	Within 9 months

Gold

- The facility demonstrates best practices.
- The facility has no major safety, health, labor, or environmental issues.
- The facility will be re-audited within 24 months of the previous audit.
- Due to exceptional performance, the next follow-up audit cost is paid by Burton.

Silver

- The facility has minor system failures, though it may be making progress toward best practices.
- The facility has some minor safety, health, or labor issues.
- While the facility is authorized to produce Burton or related licensed products, Burton requires that the issues be corrected in a timely manner as outlined in the CAP.
- The facility will be re-audited within 18 months of the previous audit.
- The facility is responsible to pay the audit cost regardless of audit type.

Orange

- The facility has some major safety, health, or labor issues and/or the facility is making no progress.
- These issues may include excessive working hours, incorrect overtime compensation, or locked emergency exits.

- If a facility fails to follow through on agreed facility upgrades and/or related remedial actions, Burton reserves the right to cancel any outstanding purchase order(s), manufacturing agreement(s), or license agreement(s).
- The facility will be re-audited within 12 months of the previous audit.
- The facility is responsible to pay the audit cost regardless of audit type. If a third party conducts the original failing audit, the facility is responsible to pay for another third-party audit.

Red

- The facility may be uncooperative, demonstrates general disregard for Burton codes and standards, is unwilling or unable to drive important change, deliberately misleads auditors, and/or audit shows critical systemic repeated problems. Examples include but are not limited to:
 - Management specifically refuses or continues to demonstrate that it is unwilling to comply with Burton standards, or fails to follow through on agreed facility upgrades.
 - Facility denies access to Burton-nominated auditors.
 - Management provides false information (e.g. statements, documents, demonstrates coaching).
 - Facility outsources to an unapproved or unauthorized facility.
 - Management uses force to compel illegal work hours.
 - Management denies workers freedom of association.
 - Facility is systemically not paying the legally mandated minimum wage or benefits.
 - Facility conducts pregnancy testing as a condition of employment.
 - Facility does not provide legally required maternity leave.
 - Facility critically violates the hours of work standard.
- If a facility fails to correct any of the above or similar issues, Burton reserves the right to cancel any outstanding purchase order(s), manufacturing agreement(s), or license agreement(s).
- Burton requires that any of the above or similar issues be corrected in a timely manner as outlined in the associated CAP. An on-site follow-up inspection may occur as part of corrective action verification.
- The facility is responsible to pay the audit cost regardless of audit type. If a third party conducts the original failing audit, the facility is responsible to pay for another third-party audit. If the result of an internal audit was a failing score, then the facility is responsible to pay for a third-party re-audit.

Zero Tolerance

- Zero Tolerance issues are absolutely unacceptable. Zero Tolerance issues include:
 - Child Labor
 - Forced/Prison Labor
 - Life Threatening Conditions
 - Abuse or Harassment
 - Bribery
- Burton requires that the facility must initiate the correction of any Zero Tolerance issue within 24 hours of the completion of the original audit.
- The Burton Sustainability Team will work with the facility to follow up on remediation for the Zero Tolerance issue, and the facility must schedule a follow-up audit within timelines established by Burton.
- Burton retains the right to cancel any outstanding contract(s), purchase order(s), manufacturing agreement(s), or license agreement(s). If purchase orders are cancelled, the facility may be placed on probation for up to one year, the ramifications of which shall be solely determined by Burton. The facility will have an on-site follow-up inspection if the relationship has not otherwise been terminated. Following probation, the facility must successfully pass an audit (score of 80 and above) prior to renewing production. The facility is responsible to pay the audit cost regardless of audit type. If a third party conducts the original failing audit, the facility is responsible to pay for another third-party audit. If result of an internal audit was a failing score, then the facility is responsible to pay for a third-party re-audit.

3.1.3 Corrective Action Deadlines

Rating	Timeline to Demonstrate Corrective Action
Minor	12 Months
Moderate	6 Months
Major	2 months
Zero Tolerance	Initiate the correction of the issue within 24 hours of audit completion

3.1.4 Code Communication

Manufactures will at all times maintain on-site all documentation that is needed to demonstrate compliance with this Code of Conduct. All manufacturers are required to inform employees about this Code of Conduct orally and by posting the Burton Code of Conduct in a conspicuous place frequented by all employees in the local language spoken by employees, supervisors, and managers.

3.1.5 Disclosure of Facility Location and Audit Results

Burton, at its discretion, has the right to disclose facility information and audit results publically.

3.1.6 Production in Bangladesh

In recent years, there have been a number of tragedies including building collapses and fires that resulted in loss of life at facilities in Bangladesh that had not implemented rigorous safety standards. In response to these tragedies, Burton is maintaining a higher compliance standard for any production facility located in Bangladesh.

Below are the additional requirements for production occurring in Bangladesh:

- All facilities must partake in an annual social responsibility audit conducted by a third-party firm and obtain a passing score of 80 or above.
- All facilities must pay for and provide Burton with structural, electrical, and fire safety assessments annually.
- All facilities must display valid occupancy permits and recent valid inspection certificates for fire and building safety.
- No facility:
 - i. May be located in buildings or areas zoned for residential or non-industrial commercial use only;
 - ii. May be located in a multi-tenant building; or
 - iii. May be owned by absentee landlords.

3.1.7 – Acceptance of Recent and Accredited Third-Party Audit Reports

In an effort to reduce audit fatigue in our factories, Burton is willing to receive and review a third-party audit report for an on-site audit that was conducted within the past six (6) months by an accredited third-party. BSCI, SA8000, SMETA, and FLA SCI reports are all acceptable forms of accredited third-party reports. Once received, the Burton Sustainability Team will review the report and decide to accept or reject the report in place of conducting a planned on-site audit. If the report is accepted, a CAP will be issued and carried out as detailed in section 3.1.1 Audit and Follow-Up Process. If the report is rejected the Burton Sustainability Team will elect to conduct an on-site audit at the facility under consideration. If there are any questions please reach out to the Burton Sustainability Team directly by email at sustainability@burton.com.

EXHIBIT A: SUBCONTRACTOR PENALTIES

First Offense: Written warning, and production immediately ceased and relocated to a Burton-approved location. If vendor fails to cease production within ten (10) days of receipt of Burton's written warning, then it shall be subject to the Second Offense penalties set forth below.

Second Offense: Written warning, monetary fine in the amount of Ten Thousand and 00/100 Dollars (USD \$10,000.00) to be paid by vendor to Burton in immediately available funds in accordance with payment terms supplied by an authorized Burton representative, and production immediately ceased and relocated to a Burton-approved location. If vendor fails to pay the aforementioned fine AND cease production within ten (10) days of receipt of Burton's second written warning, then it shall be subject to the Third Offense penalties set forth below.

Third Offense: Written warning, monetary fine in the amount of Ten Thousand and 00/100 Dollars (USD \$10,000.00) or Ten Percent (10%) of the F.O.B. price of the goods manufactured at such unauthorized location, whichever is greater, to be paid by vendor to Burton in immediately available funds in accordance with payment terms supplied by an authorized Burton representative; and production immediately ceased and relocated to a Burton-approved location. If vendor fails to pay the aforementioned fine AND cease production within ten (10) days of receipt of Burton's third written warning, then Burton may, without liability, immediately terminate all pending production orders with Supplier, regardless of production location.

For purposes of these penalties, a vendor shall be deemed to have received written notice three (3) business days after such notice is sent by Burton via an internationally recognized courier.

In addition to the above penalties, upon three or more separate violations of the subcontractor notice and approval requirements, Burton, at its sole option and without further liability, may immediately terminate all pending production orders with vendor.

Note: The above penalties shall be applied regardless of whether Burton later approves any such location.

3.2. CHEMICALS MANAGEMENT MONITORING PROGRAM

The Chemicals Management Monitoring Program is comprised of four types of monitoring to verify that suppliers are meeting relevant requirements of the Code of Conduct, the RSL, and applicable laws and regulations: Chemicals Testing; the Sustainable Chemicals Process Identification and Inventory Management Project (“SCPIIMP”); Chemicals Management Verification; and the Higg Facility Environmental Module.

We recognize the challenges associated with chemicals management. The Burton Sustainability Team is available to answer questions or provide assistance in the form of education and training upon request. Please contact us by sending an e-mail to sustainability@burton.com.

3.2.1. Chemicals Testing

Burton may request testing from a supplier once annually or more often as deemed necessary. If testing is requested, please fulfill items 1 - 6 below and send all outlined information and reports to sustainability@burton.com. The supplier is responsible for all costs associated with analytical testing. Should a supplier demonstrate a test failure, Burton reserves the right to increase the frequency of testing required of the supplier for one year from the date of the test failure or until the supplier adequately demonstrates the specific issue has been properly addressed.

1. Provide the contact information of the person(s) responsible for chemicals management and the restricted substances testing program in each manufacturing location.
2. All youth category products require annual lead testing in order to satisfy the requirements of the Consumer Product Safety Improvement Act (“CPSIA”). These reports must be provided to us annually prior to bulk production. Suppliers must test designated materials annually for compliance with the RSL and provide those reports to us upon receipt. Each supplier will be provided with:
 - a. A list of materials that require chemical testing.
 - b. A clear description of the test package:
 - i. Basic CPSIA certification testing,
 - ii. Specific chemical testing, or
 - iii. Complete RSL testing.
3. Suppliers are responsible for:
 - a. Confirming test material sample availability,
 - b. Shipment of samples to the laboratory, and
 - c. Communicating testing timelines.
4. Vendor shall submit production quality samples to an ISO17025 certified lab (see suggestions below).
 - a. Samples must meet minimum sample size / mass requirements.
 - b. Samples must be individually packaged and labeled.
5. If applicable, material test failures are reviewed and investigated, and corrective actions are implemented.
 - a. Stakeholders are notified,
 - b. Burton issues a Failure Resolution Form (“FRF”) to vendor, and
 - c. Vendor determines root cause, implements countermeasures, and signs and returns the FRF to Burton for review and approval.

Material Testing Matrix

See Attachment E - bluesign Template Testing Matrix.

Usage Range

See Attachment F - bluesign Template Usage Ranges.

Test Request Form (TRF)

See Attachment G - Chemical Testing TRF Template.

Testing Labs

The labs listed below are provided for your convenience only. You may elect to use any lab that is ISO17025 certified.

SGS China (Guangzhou)	SGS Taiwan
<p>SGS-CSTC Standards Technical Services Co., Ltd. 2/F, 198 Kezhu Road, Sciencetech Park Guangzhou Economic & Technology Development District, Guangzhou, Guangdong, CHINA 510663</p> <p>Contact: Mina Liu Email : mina.liu@sgs.com Phone: (86-20) 8215 5534 / (86-20) 8215 5618 Telefax: (86-20) 8207 5191</p>	<p>SGS Taiwan Limited No. 31, Wu Chyuan Road Wuku Industrial Zone Taipei County 248 TAIWAN</p> <p>Contact: Cindy Chen Email: cindy.chen@sgs.com Phone: (886-2) 22.99.39.39 / (886-2) 22.99.29.11 Telefax: (886-2) 22.99.32.59 Lab telefax: (886-2) 22.99.32.27</p>
SGS Hong Kong	SGS Vietnam
<p>SGS Hong Kong Ltd. 5/F - 8/F & 28/F, Metropole Square 2 On Yiu Street, Siu Lek Yuen Shatin, N.T., Hong Kong</p> <p>Contact: Ruth Hon Email: ruth.hon@sgs.com Office: (852) 2774 7151 Lab: (852) 23.64.22.72 Sample pick-up: (852) 27.74.71.33 Telefax: (852) 2330 4862 Lab telefax: (852) 27643276</p>	<p>SGS Vietnam Ltd – Ho Chi Minh Laboratory Unit no. 1B, 2nd Floor, Standard Factory Building No.2, Road 15, Tan Thuan EPZ, Tan Thuan Dong Ward, District 7, HCMC, Vietnam.</p> <p>Contact: Trinh Vu Email : Trinh.Vu@sgs.com Phone: (84-8) 377 00 339, ext. 119 Telefax: (84-8) 377 00 340</p>

3.2.2. Sustainable Chemicals Process Identification and Inventory Management Project (“SCPIIMP”)

All suppliers are required to complete the SCPIIMP reporting template for each facility on an annual basis. Burton will contact suppliers with this request and will provide the latest version of the template, Attachment H.

3.2.3. Chemicals Management Verification

Improper chemical storage, transportation, use, or disposal can adversely impact EHS. To monitor chemicals management practices in facilities manufacturing goods for Burton, our staff may conduct a chemicals management verification at each facility once annually or more often as deemed necessary. Verifications may be announced or unannounced. A facility tour will be conducted, on average lasting between two (2) to four (4) hours. Verification activities include observation, interviews with facility workers, and document review. If an issue is identified, a corrective action plan (“CAP”) will be issued. The facility will be required to respond to the CAP as outlined in the Social and Environmental Responsibility Audit Program.

The EHS verification is conducted in order to confirm the following requirements are met:

- 1) Document the complete inventory of all of the chemicals used in manufacturing processes, with annual volumes for each;

- 2) Maintain a Globally Harmonized System of Classification and Labelling of Chemicals (“GHS”) compliant Safety Data Sheet (“SDS”) for each chemical, readily available to workers, written in the local language and in other language(s) should foreign workers be regularly present at the facility;
- 3) Provide protections for workers aligned to each SDS (protections may include a combination of personal protective equipment and/or controls within the facility); and
- 4) Ensure proper labeling of storage containers and storage areas.

3.2.4. Higg Index Facility Environmental Module

All suppliers are required to complete the Higg Index Facility Environmental Module on an annual basis for each facility, at cost to the supplier, and to share the module results with Burton via the Higg Index platform.

<http://apparelcoalition.org/the-higg-index/>

3.2.5 Guidance on Implementing a Strong Chemicals Management Program

Burton encourages its suppliers to continually develop their chemicals management and EHS programs beyond regulatory requirements and those requirements outlined in this document. The following are example elements of a strong chemicals management and EHS program. Guidance on incorporating these and other elements in your own program can be found in Attachment D - Chemicals Management Guide & Training for Manufacturers.

- Develop and maintain procedures and electronic record keeping to measure and manage risks affecting EHS. (See Sections 3, 4, 7, 8, and 9 of Attachment D.)
 - Annual review of all current SDS data against the current RSL and MRSL (See Attachment B.)
 - Annual programs evidenced by documents, testing, and report summaries to verify the requirements of all permits, emissions regulations, and occupational health and safety standards are being continually met
 - Records of EHS training maintained, which include at minimum the date(s), topic(s), trainer(s), and worker(s) in attendance
 - Records for each tool and system used to manufacture items and operate the facility
- Implement an internal auditing program to measure and manage the effectiveness of EHS policies and procedures, to assure continued compliance to applicable permits and regulations, and to support continuous improvement.
- Manage all resource inputs and outputs of facilities beyond the minimum requirements of the Code of Conduct and applicable regulations. (See Sections 4, 6, 7, and 8 of Attachment D.)
- Establish and demonstrate measureable progress toward chemicals management and EHS improvement goals. Goals should include resource, cost, and risk reduction for all stakeholders.
- Work with customers and suppliers to select and use less toxic chemistry and materials where possible. (See Section 9 of Attachment D.)

Part III: Guidance on Certain Chemistry and Regulations

The following guidance addresses a subset of the legal requirements applicable to Burton product manufacturing. It is the responsibility of each supplier to adhere to all local, national, and international laws applicable to its operations.

4.1 PRINTING PROCESSES AND INKS

The following provides guidance for inks and identifies high-risk processes that we seek to eliminate from our supply chain and manufacturing processes. While prints provide unique aesthetic and style options, they also present additional risk to the environment, workers, and consumers through the use of additional chemistry. We seek to minimize these impacts in the near term and eliminate them over the long term wherever possible.

Print Process	Decision
Screen Printing	
- Water based inks	Approved for use. Low risk of RSL failure.
- Non-PVC plastisol (high solids acrylic) inks	Approved for use. Low risk of RSL failure.
- Silicone inks	Approved for use. Low risk of RSL failure.
- Low formaldehyde discharge inks	Moderate risk of RSL failure – RSL testing Required. Prohibited in Children’s products.
- PVC (plastisol) inks	Prohibited. High risk of RSL failure.
- Conventional discharge inks	Prohibited. High risk of RSL failure.
Roller Prints	
- Water based inks	Approved for use. Low risk of RSL failure.
- Low formaldehyde discharge inks	Moderate risk of RSL failure – RSL testing Required. Prohibited in Children’s products.
- Conventional discharge inks	Prohibited. High risk of RSL failure.
Digital Ink Jet Printing	
- All ink systems	Approved for use. Low risk of RSL failure.
Dye Sublimation Printing	
- All ink systems	Approved for use. Low risk of RSL failure.
Hard Face Printing	
- All ink systems with a water based PU coat	Approved for use. Low risk of RSL failure.
- All ink systems with a solvent based PU coat	Moderate risk of RSL failure – RSL testing Required. Prohibited in Children’s products.
Heat Transfers	
- Polyurethane heat transfers	Approved for use. Low risk of RSL failure.
- Heat transfers containing PVC	Prohibited. High risk of RSL failure.

4.2 METAL PARTS AND FINISHES ON METAL PARTS

Extreme care should be taken in the sourcing of metals used in the manufacture of articles. Great care should also be exercised in the selection of processes used to create finishes on metal parts. Toxic and restricted heavy metals shall be eliminated from all supply chain sources and finishing processes.

We require that all suppliers who provide us with metal parts and or finishes request, obtain, and maintain accurate records of all raw material certificates of conformance, certificates of analysis, specifications, and any and all other records pertaining to the content and limits of off spec elements in source metals and the finished parts that are

ultimately incorporated into our products. This is required regardless of whether these parts are nominated or not, and regardless of where the supplier resides in the supply chain.

Similarly, as it relates to the processes used in applying finishes to metal parts, we require our suppliers and their suppliers in turn to create and maintain accurate records of all process input chemistries used in the application of finishes to metal parts used in our products.

Should banned heavy metals be found, we require our suppliers to determine the root cause of the contamination and implement corrective actions in order to eliminate them from the supply chain.

4.3 PHTHALATES

Phthalates are harmful substances and are banned in all Burton products. We require that all suppliers provide us with proof and assurances that all materials (plastics, glues, adhesives, inks, paints, etc.) are free of these substances. Should phthalate(s) be found, we require our suppliers to determine the root cause of the contamination and implement corrective actions in order to eliminate them from the supply chain.

4.4 LEAD IN PAINTS, SUBSTRATES, AND SURFACE COATINGS

Lead has been a banned substance for many years. Yet, it can still be a significant contaminant in many supply chains. We require our suppliers to take every reasonable measure to eliminate all potential sources of lead from entering our supply chain and finished products. Should lead be found, we require our suppliers to determine the root cause of the contamination and implement corrective actions to eliminate it from the supply chain.

4.5 THE REGISTRATION, EVALUATION, AUTHORIZATION, AND RESTRICTION OF CHEMICALS (“REACH”), REGULATION EC NO 1907/2006

None of the products and packaging materials supplied to Burton shall contain SVHC candidate(s) in excess of 0.1%, substances restricted in articles, or substances that are subject to authorization under REACH. Suppliers shall commit to comply with this and all future SVHC candidates added to this regulation, and will immediately inform Burton in the event that an SVHC is present in excess of 0.1% in an article supplied to Burton.

4.6 PROPOSITION 65 OF THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986

None of the products and packaging supplied to Burton shall contain any chemical(s) listed on the Proposition 65 list. In the event that a Proposition 65 chemical(s) is present in a product or packaging, you shall notify Burton prior to production and with sufficient lead-time in order to comply with the applicable labeling requirements of the law and reasonably meet the target date for product launch to market. You will also commit to removing said chemical(s) from our supply chain, manufacturing processes, products, and packaging supplied to Burton as soon as reasonably achievable.

4.7 THE CONSUMER PRODUCT SAFETY ACT (“CPSA”), THE CONSUMER PRODUCT SAFETY IMPROVEMENT ACT (“CPSIA”), AND THE CANADA CONSUMER PRODUCT SAFETY ACT (“CCPSA”)

Products and packaging you provide Burton shall comply with the applicable requirements of CPSA, CPSIA, and CCPSA. This includes but is not limited to the furnishing of third party analytical testing reports for lead in children’s products. Note that CPSIA requires third party analytical testing for Lead, Phthalates, and Flammability in children’s products.

4.8 USE OF BIOCIDES AND PESTICIDES

Any product provided to Burton containing a biocide or pesticide shall comply with the EU Biocidal Products Rule and U.S. Environmental Protection Agency (“EPA”) regulations. These substance(s) must be approved for use by the European Chemicals Agency and the U.S. EPA prior to production. Products and their packaging shall be labeled in accordance to these regulations including a claim of the biocidal product (“anti-stink,” “antimicrobial,” etc.) and the name of the biocide. The manufacturer of the biocide shall provide all accurate and necessary information in order to meet these labeling requirements.

4.9 PRODUCTS AND MATERIALS INTENDED TO HAVE CONTACT WITH FOOD

Any product or material intended to have contact with food shall comply with 21 CFR § 177 of the U.S. Code of Federal Regulations. Suppliers shall provide declaration(s) of compliance to this regulation to Burton prior to production.

List of Attachments

The following relevant documents are available for download at <http://vendor.burton.com/>:

Attachment A - FLA Workplace Code of Conduct and Compliance Benchmarks

Attachment B - bluesign Restricted Substances List ("RSL")

Attachment C - bluesign System Substances List ("BSSL")

Attachment D - Chemicals Management Guide & Training for Manufacturers

Attachment E - bluesign Template Testing Matrix

Attachment F – bluesign Template Usage Ranges

Attachment G - Chemical Testing TRF Template

Attachment H - Sustainable Chemicals Process Identification and Inventory Mapping Project ("SCPIIMP") Template

Attachment I – Corrective Action Plan ("CAP") Example