








TOM TAILOR CHEMICAL REQUIREMENTS

Chemical Management

TOM TAILOR GmbH (hereby "TOM TAILOR") is a member of the Zero Discharge of Hazardous Chemicals (ZDHC) community since Aug 2023. TOM TAILOR adopts the ZDHC chemical management approach to support our business partners in establishing their chemical process according to the three pillars of INPUT, PROCESS and OUTPUT management. This further strengthens our steps through the Zero Discharge Journey since 2016.

TOM TAILOR expects commitment of suppliers to the ZDHC programme by registering themselves on [ZDHC Gateway](#) and connecting with TOM TAILOR on the platform, and set up their chemical management system in accordance with [ZDHC Chemical Management System Framework \(CMS\)](#) and [Technical Industry Guide \(TIG\)](#), as well as relevant supporting tools and documents.

Suppliers should comply with basic control over INPUT - PROCESS - OUTPUT as follows:

	Input	Process	Output
Measures	 Responsible Chemicals Procurement	 Best-in-class Program & Tools	 Transparency & Compliance with Global Legislations
Guidelines	ZDHC MRSL Compliance	ZDHC Chemical Management System & Technical Industry Guide	ZDHC Wastewater Report
Solutions	 InCheck	  GATEWAY Supplier to Zero	 ClearStream
Expectations <i>Applicable for all Tier 1 suppliers/factories with wet processing, and all Tier 2 fabric/yarn suppliers</i>	Foundation: Provision of InCheck Report Advanced: Provision of verified InCheck Report	Registration to Supplier to Zero (StZ) initiative, and Completion of Self-assessment Implementation of ZDHC Commodity Chemicals Guide & Air Emission Guide	Provision of ClearStream Report (at least every 12 months)

Reference:

- [ZDHC Manufacturing Restricted Substance List \(MRSL\)](#)
- [ZDHC Chemical Management System Framework \(CMS\)](#)
- [ZDHC CMS Technical Industry Guide \(TIG\)](#)
- [ZDHC Commodity Chemicals Guide](#)
- [ZDHC Air Emission Guide](#)
- [ZDHC Wastewater Guidelines](#)

Legal Requirements

REACH, SVHC, POP Regulation

Part of the European Union's key chemical legislation is the European Regulation (EC) 1907/2006. This regulation is also known under the acronym "REACH" (Regulation for Registration, Evaluation, Authorisation and Restriction of Chemicals). Since 1st June 2007 the regulation has a direct effect in each member state of the European Union.

REACH aims at protecting health and environment through a safe handling with chemicals. The safe use of chemicals must be ensured, particularly regarding the protection of human health and environment (ground, air, water) as certain key priorities of the REACH regulation.

Substances of very high concern (SVHC) are defined in Article 57 of Regulation (EC) No 1907/2006 ("the REACH Regulation") and include substances which are Carcinogenic, Mutagenic, or toxic to Reproduction (CMR), meeting the criteria for classification in category 1 or 2 in accordance with Directive 67/548/EEC, Persistent, Bioaccumulative and Toxic (PBT) or very Persistent and very Bioaccumulative (vPvB) according to the criteria in Annex XIII of the REACH Regulation. Furthermore substances – such as those having endocrine disrupting properties – or those for which there is scientific evidence of probable serious effects to human health or the environment which give rise to an equivalent level of concern can be defined as SVHC. Those SVHC substances are put on the so-called candidate list which may be included in Annex XIV, the LIST OF SUBSTANCES SUBJECT TO AUTHORISATION by use within the EU.

For TOM TAILOR as "producer" of articles which are put on the market within the EU, our suppliers should follow the below requirements:

The supplied goods must correspond to the prohibition and limitation of toxic substances as they are laid down in the Annex XVII of the Regulation (EC) 1907/2006, which can be downloaded from the following website, and which forms an essential part of this agreement:

<https://echa.europa.eu/substances-restricted-under-reach>

The supplied products are not allowed to include more than 0.1 % (this corresponds to 1000 mg/kg or 1000 ppm) of a substance of very high concern registered in the actual (date of delivery) REACH-"Candidate-List", which can be downloaded from the following website:

<https://echa.europa.eu/de/candidate-list-table>

The mentioned weight limit of 0.1 % refers to the weight of the respective products including its packaging. In case of a compound product, the weight of each separate component is relevant (ECJ, judgment of 10. September 2015, C-106/14), for example the weight of yarn, of inlays, buttons, or zippers.

Besides REACH the POP Regulation is very important: it is the Regulation (EU) No 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants (POPs Regulation). The products supplied must comply with the requirements of the POP Regulation (EU) 2019/1021 (formerly (EC) No. 850/2004) as amended at the time of delivery. In particular, the limit values defined in Annexes I to V must be complied with. The current version of the POP Regulation (with its amendments) can be found under the following link:

https://eur-lex.europa.eu/legal-content/DE/ALL/?uri=uriserv:OJ.L_.2019.169.01.0045.01.DEU

and

<https://eur-lex.europa.eu/legal-content/DE/TXT/PDF/?uri=CELEX:32020R0784&from=EN>

and


<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R0277&from=EN>.

The supplier is obliged to inform himself regularly about the current version of the POP Regulation.

Product Quality Requirements and Chemical Testing

With the proper set-up of Chemical Management System, the chemical compliance should be assured. For confirming the compliance and as part of TOM TAILOR's Quality Management, the Product Chemical Test Package (CTP) is used as a supplementary measure for OUTPUT control.

Our suppliers must comply with the most up-to-date [AFIRM RSL](#) and [Packaging RSL](#) which are reviewed and updated annually by the Apparel and Footwear International RSL Management Group (AFIRM Group), as well as exceptions specified by TOM TAILOR as follows:

		RSL Textiles & Trims		
Group	Substance	CAS-No.	Test Method	Test Limit in mg/kg
Organic Substances				
PVC	Polyvinylchloride	9002-86-2	Beilstein test; FTIR (if Beilstein test positive)	negative
Soluble Proteins	Soluble Proteine (from natural rubber)		DIN EN 455-3 (modified) Lowry method	n.d (detection limit 20 in sum)
Glutaraldehyde	Glutaraldehyde	111-30-8	ISO 17226-1, -2	1000
Others				
Determination of Odours	No odour from mould, high boiling fraction of petrol, fish, aromatic hydrocarbons or perfume.		Sensoric determination of odours: SNV 195 651	3 (tolerable odour) or below
Packaging				
PVC in packaging	Polyvinylchloride	9002-86-2	Beilstein test; FTIR (if Beilstein test positive)	negative
Cobalt dichloride		7646-79-9	Inhouse method	no usage
Mineral Oil Hydrocarbons	Mineral Oil Aromatic Hydrocarbons (MOAH) consisting of 1 to 7 aromatic rings	various	HPLC-GC-FID method	in printing inks 1000
	Mineral Oil Aromatic Hydrocarbons (MOAH) consisting of 3 to 7 aromatic rings			in printing inks 1
	Mineral Oil Saturated Hydrocarbons (MOSH) consisting of 16 to 35 carbon atoms	various		in printing inks 1000

For GOTS certified styles/products, there are specific requirements. Please check details from [Organic Cotton GOTS Feb 2025.pdf](#) and the applicable GOTS standards.

Baseline Compliance

All suppliers must ensure they conform with ZDHC MRSL in production and no hazardous substances/residues should be identified in products comparing to AFIRM RSL and applicable legal requirements (REACH and POP) and in wastewater comparing to ZDHC Wastewater Guidelines. They must make sure the most up-to-date versions are always followed.

The supplier must ensure that its upstream suppliers (Tier 2 material manufacturers) and any subcontractors (e.g. for washing, dyeing, coating or printing) also comply with the ZDHC MRSL by contractually obligating them to comply and by carrying out regular checks.

ZDHC Requirements

The Supplier, as well as its relevant suppliers and subcontractors, must be registered on the ZDHC Gateway platform and connected to TOM TAILOR.

Input:

- The Supplier shall update its InCheck Report every 6 months to ensure continued compliance with ZDHC guidelines.
- Any non-conformant chemical products must be substituted with alternatives that meet at least ZDHC Level 1 conformance.
- Additionally, the Supplier shall request its chemical suppliers to upload their chemical products to the Gateway Chemical Module and actively encourage any unregistered chemical suppliers to register and upload their chemical products.

Process:

- The Supplier shall participate in the ZDHC “Supplier to Zero” program in order to build capacity on proper chemical management systems in accordance with the [ZDHC Chemical Management System Framework \(CMS\)](#). Suppliers must achieve at least Level 1 („Foundational”).
- We strongly recommend that suppliers progress to Level 2 (“Progressive”) to demonstrate further commitment to sustainable chemical management practices.
- Suppliers are encouraged to actively engage in capacity building measures by participating in ZDHC Academy trainings or other ZDHC-endorsed training schemes relevant to chemical management and the implementation of the ZDHC Framework. Registration on the ZDHC Academy platform (academy.roadmaptozero.com) is free of charge, and a selection of trainings and webinars is available at no cost.

Output:

- The Supplier shall submit an annual ZDHC ClearStream Report and must ensure that the laboratory uploads the report to the ZDHC Gateway.
- Wastewater testing results must, at a minimum, meet the ZDHC WWG Foundational Level limits.
- In the event of non-conformities, the Supplier shall conduct a root cause analysis (RCA), develop a corresponding corrective action plan (CAP), and upload both to the ZDHC Gateway Wastewater Module.

General:

- In the event of non-compliance with any of the requirements outlined in this section, TOM TAILOR reserves the right to cancel any outstanding orders and suspend new developments until remediation.

Timelines for ZDHC Implementation

For Suppliers who are already registered to the ZDHC Gateway,

- Connection on ZDHC Gateway will be made immediately upon successful onboarding
- Follow the routine to update the InCheck and ClearStream reports

For Suppliers who are new to the ZDHC programme, upon successful onboarding,

- Within one month: complete registration to the ZDHC Gateway and connect with TOM TAILOR
- Within three months: complete registration to the Supplier to Zero (StZ) programme
- Within in six months: complete and share the first InCheck report
- In accordance with the reporting timeline by ZDHC, i.e. by end of Apr and/or Oct of the year: complete and upload the first ClearStream report

Suppliers with wet processing in place MUST complete the steps.

Suppliers without wet processing will be reviewed on a case-by-case basis and should at least register to the ZDHC Gateway and Supplier to Zero programme.

Trims/accessories suppliers are optional for the ZDHC Gateway registration.

Contacts

ZDHC Programme: Linda Bauer, Manager Sustainability (linda.bauer@tom-tailor.com)

Chemical Requirements and Test Package (CTP): Heike Tober (heike.tober@tom-tailor.com) and Antje Majnaric (antje.majnaric@tom-tailor.com).

COMMITMENT TO COMPLYING WITH TOM TAILOR CHEMICAL REQUIREMENTS

We hereby confirm that:

1. We have received, read, and thoroughly understood **TOM TAILOR Chemical Requirements**, including Commitment to the compliance with the most up-to-date versions of ZDHC MRSL, AFIRM RSL and Packaging RSL (with TOM TAILOR specifications and GOTS standard), and applicable legal requirements (REACH and POP), as well as Participation in ZDHC Programmes per given timelines (where applicable).
2. We acknowledge that compliance with the TOM TAILOR Chemical Requirements is a contractual obligation. Accordingly, we undertake to meet the Chemical Compliance requirements regarding all orders involving production, marketing and/or distribution.
3. We commit to informing the entire supply chain of production, including production facilities, subcontractors, sub-processors, wet processing units, and other relevant entities, about the TOM TAILOR Chemical Requirements. Additionally, we formally request compliance with these requirements.
4. TOM TAILOR:
 - a. Reserves the right to amend or update these Chemical Requirements as necessary, in particular if legal, regulatory or industry-specific requirements (e.g. under the ZDHC Programme) change, or if TOM TAILOR further develops its internal sustainability or quality objectives. TOM TAILOR will inform suppliers of any significant changes in an appropriate manner (e.g. by e-mail or through other suitable communication channels). The latest version shall be deemed binding as of the date specified in the notification.
 - b. Reserves the right to verify: 1) compliance with TOM TAILOR Chemical Requirements regarding any goods supplied, by any method, at any time, and/ or at any stage of the production, marketing, or distribution processes.
 - c. Reserves the right to cancel any order for any goods where non-compliance with TOM TAILOR Chemical Requirements regarding any test and/ or inspection carried out pursuant to the printout has been established.
 - d. Is legally prohibited to sell goods failing to meet the chemical requirements and therefore reserves the right to cancel or destroy, or to order destruction of the goods subject to the cancelled order. Such cancellation relieves the obligation to remit any payment for goods failing to meet TOM TAILOR Chemical Requirements.
 - e. Holds the Supplier solely accountable for any and all damages resulting from goods failing to comply with TOM TAILOR Chemical Requirements.
 - f. Reserves the right to stop business with the Supplier whenever the cases of non-compliance to the TOM TAILOR Chemical Requirements occurs.

Place, Date:

Name and position of the signatory in bold letters:

Name of the Company in bold letters:

Signature, Company stamp:
