

# Leather and Compliance

Smythson Training
Workshop
20th March 2025

INDUSTRY LED – CONSUMER FOCUSED – TRANSPARENCY YOU CAN SEE

WWW.SUSTAINABLELEATHERFOUNDATION.COM

#### Introduction

- Founder and Managing Director of Sustainable Leather Foundation.
- UN/CEFACT Consultant, United Nations European Commission for Europe –
  - Leather Value Chain Expert, working on the project to "Enhance Transparency & Traceability in the Garment and Footwear Sector"
  - Leather Value Chain Expert, working on the UN/CEFACT Core Component Library
- Vice-President of the Society of Leather Technologists and Chemists (SLTC)
- Practitioner Member of the Chartered Quality Institute (PCQI) and a Qualified SA8000 Social Systems Lead Auditor
- Liveryman of the Worshipful Company of Curriers
- Previously, 5 years managing the Leather Working Group





Deborah Taylor, PQCI Managing Director, Sustainable Leather Foundation

#### Today's Workshop



9.10 Chemical Compliance

9.35 European Union Deforestation Regulation (EUDR)

10.00 Break

10.10 European Union Green Claims Directive (EUGCD)

10.20 Digital Product Passport

10.30 Introduction to the SLF Dashboard

10.50 Smythson CSR Strategy

11.00 Open Q&A and Close



### Why is compliance necessary?

ABLE LEPTHER.

Compliance means following rules/regulations/orders in the workplace and they usually vary depending on the industry you work in. For the leather industry (and related paper industry) compliance falls into different categories

#### Voluntary Compliance

- Facility Certification such as
  - SLF audits
  - LWG audits
  - ISO certification
  - FSC Certification

#### Regulatory Compliance

- Chemical Safety:
  - Reach
  - Prop 65
- Environmental Protection:
  - EUDR
- Consumer Protection:
  - EUGCD

### Corporate Compliance

- Legal and Financial
- Corporate expectations for suppliers:
  - Ethical Business
     Practice
  - Lead times
  - Quality
     Expectations

### Why is compliance necessary?

Compliance ensures that we act responsibly as businesses and have a mechanism to demonstrate that responsibility.

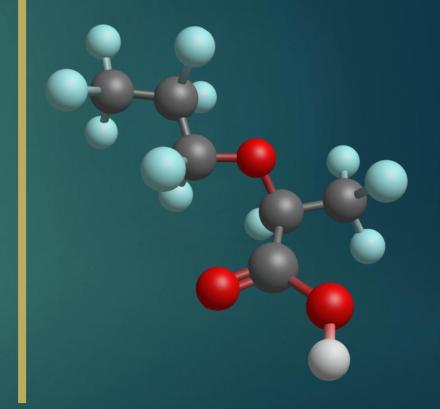


- Mitigation of risk: By identifying and addressing potential compliance risks early on, companies can avoid contributing to negative impacts and operational problems
- Reputational risk: Compliance demonstrates a commitment to ethical and responsible behaviour, which builds trust with stakeholders and enhances a company's reputation.
- Continuous Improvement: Compliance can involve regular audits, testing and assessments, which can lead to identifying areas for improvement and enhancing overall performance.
- Consistency: Compliance helps ensure that all organisations in a value chain operate to the same standard, ensuring fairness and consistency across the business.
- Protection of People and the Planet: Compliance regulations are designed to protect human safety, customer privacy, and the environment.

### Chemical Compliance

- Chemical compliance in the leather industry is crucial for ensuring environmental sustainability, worker safety, and consumer health.
- The leather production process involves various chemicals for tanning, dyeing, and finishing, making strict regulation essential.
   Key regulations and standards include:
  - **REACH (EU)** Controls hazardous substances used in leather processing.
  - **ZDHC (Zero Discharge of Hazardous Chemicals)** Aims to eliminate harmful chemical discharges from use.
  - California Prop 65 Protects California residents from chemicals that cause cancer, birth defects, or reproductive harm.
  - Sustainable Leather Foundation (SLF) Promotes transparency, accountability, and certifies best practices in chemical management within the leather industry.
  - Leather Working Group (LWG) Certifies tanneries based on responsible chemical management.





#### MRSL vs RSL





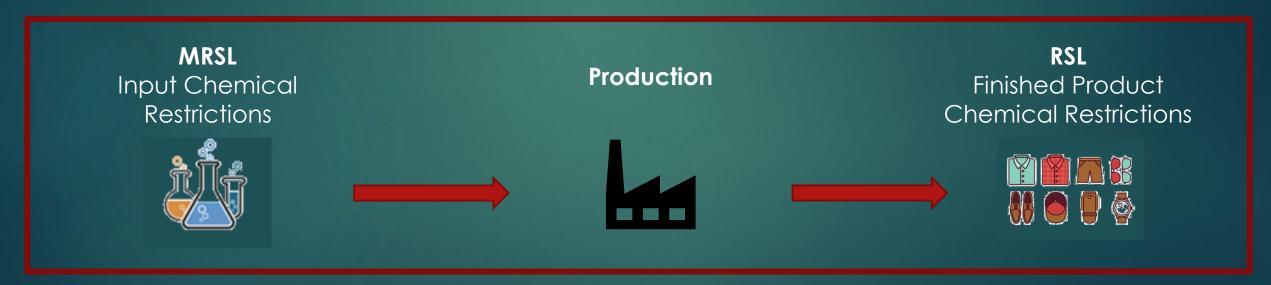
RSL (Restricted Substance List) – A list detailing chemical restrictions in finished material or product (sometimes called a PRSL - Product RSL)





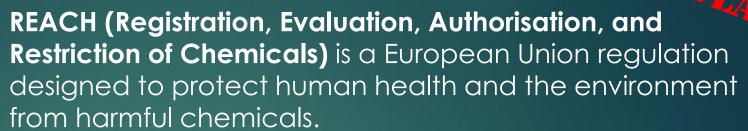


MRSL – (Manufacturing Restricted Substance List) - A list of chemicals subject to restrictions in supplied chemical formulations used in the manufacture of leather



Note: the same chemical may feature on both lists (or may not) but the limits of restriction may be different.





- Enforced by the European Chemicals Agency (ECHA), REACH applies to all industries, including leather production and paper manufacture, where chemicals are used in tanning, dyeing, and finishing processes.
- Under REACH, companies must:
  - Register chemical substances they manufacture or above one tonne per year.
  - **Evaluate** risks associated with chemicals and their impact on health and the environment.
  - **Authorise** or restrict hazardous substances to phase out harmful chemicals.
- REACH was first entered into force in 2007 and is currently undergoing a review in line with the European Commission's Better Regulation provisions. This will include public review.

#### REACH

Chemical manufacturers, importers and users





REACH places responsibility on industry to manage the risks from the chemicals and to provide safety information on the substances.

To enable that, manufacturers and importers are required to gather information on the properties of their chemical substances and:

- **Register:** all relevant chemical information in a central database in the European Chemicals Agency (ECHA). There is an administration fee for registering with the ECHA which varies depending upon the size of business (large, medium or small).
- **Evaluation:** ECHA and the Member States then evaluate the information submitted by companies to ascertain whether a given substance poses risks to human health or the environment.
- Authorisation: The authorisation process aims to ensure that substances of very high concern (SVHCs) are progressively replaced by less dangerous substances or technologies where technically and economically feasible alternatives are available.

# 

Chemical manufacturers, importers and users





If you are a manufacturer of chemicals, an importer or chemicals or a user of chemicals in the EU/EEA you will have some responsibilities under REACH.

bound by the obligations of REACH, even if you export products into the customs territory of the European Union. The responsibility for fulfilling the requirements of REACH, such as registration lies with the importers established in the European Union, or with the only representative of a non-EU manufacturer established in the European Union.

Your customers in the EU may require compliance for them to meet the requirements.

#### ZDHC - Zero Discharge of Hazardous Chemicals

ZDHC Was established in 2011 by a group of 8 brands:

 Adidas, Nike, Puma, H&M, C&A, Levi Strauss, G-Star, Jack Wolfskin.

The original mission was to achieve zero discharge of hazardous chemistry in the textile sector by 2020.

Since that time, the scope has significantly grown into a programme that considers chemistry through:

- Inputs
- Process
- Outputs

The cornerstone of the ZDHC programme is their MRSL, originally developed for textiles, with a leather MRSL developed later.



#### ZDHC

• The Leather MRSL contains a list of all chemicals that should not be used in the manufacture of leather.

 LWG collaborated with ZDHC during the development of the specific MRSL for leather to ensure that through endorsement and adoption by LWG members, a plethora of other brand MRSLs would not follow.

 Within the ZDHC process, there is the ability to submit new chemicals to the "Candidate List" for evaluation for inclusion to the MRSL. If a chemical is added to the candidate list, industry should begin to develop alternatives. Chemical manufacturers, supply chain



### ZDHC – Input:

#### INPUT:

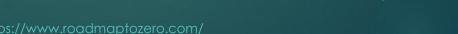
- Chemical companies can use the ZDHC Gateway to have their chemicals assessed at 3 levels:
  - Level 1 Analytical testing, screening and SDS review
  - Level 2 Onsite assessment of management systems and that level 1 requirements are fulfilled.
  - Level 3 Onsite assessment of chemical hazard assessment plus evidence of levels 1 and 2.

#### PROCESS:

 Leather Manufacturers can register with ZDHC to access the InCheck Report (inventory) that checks their chemical inventory against the ZDHC MRSL Accepted Certifications in the ZDHC Gateway. This can be verified to InCheck Level 1.







#### ZDHC

#### **OUTPUT:**

- The ZDHC Wastewater Guidelines provide a set of globally unified expectations across the textile leather and footwear industries for industrial wastewater and sludge.
- There are guidelines for parameters, sampling, analysis and electronic reporting through the ZDHC Gateway.
- With a list of approved laboratories, ZDHC have an "Approved Wastewater Laboratory Programme".







REGULATION

Prop 65 is a requirement in the State of California for any product that contains a chemical that is listed on the Proposition 65 List of Chemicals, to include a warning label on the product that reads:

"WARNING: This product can expose you to [name of chemical], which is known to the State of California to cause cancer and/or birth defects or other reproductive harm".

This warning label should be affixed only to products being placed on the market in California. It is not required anywhere else in the US or other countries.

It can be affixed on a swing tag, but it must be present with the product (not just online or as a general notice on a shelf).

Brands and Retailers

California Proposition 65

Warning: This product contains chemicals known to the State of California to cause cancer, and birth defects or other reproductive harm.

www.P65Warnings.ca.gov

It is not a requirement to use the yellow warning triangle – you can use a black and white version.

There is no rule over the size of the warning – but the wording is non-negotiable and even in short form, the font must be no smaller than 6 pitch.

There are 900 different chemicals listed in Prop 65. Chemicals that are used in leather production and that are included in the list are:

- Tanning Chemicals: calcium hydroxide, sodium sulfide, sulfuric acid, formic acid, hydrogen sulfide, aniline-based dyes, and solvents (dichloromethane, benzene, ethanol, tetrachloroethane, trichloroethylene).
- Finishing Chemicals: formaldehyde, aniline, nitrocellulose, and resins.

The question of Chrome...

Brands and Retailers

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Whilst Chromium III is not carcinogenic (cancer forming), Chrome VI is regarded as a carcinogen.

Chrome VI is not a chemical that is used in leather manufacture, but it can form as a reaction through oxidation under certain conditions, such as exposure to UV light, high temperatures, low humidity, or alkaline conditions. This is further compounded because the oxidation could occur in shipping or storage if the same conditions are present.

Butylated Hydroxyanisole BHA is not directly used in leather manufacture but has been used in Fatliquors.

Understanding the chemicals used in the manufacture, and testing of material, can support the mitigation of not using the warning labels.

https://www.p65warnings.ca.gov



Brands and Retailers



REGULATION

#### **Safe Harbour Levels**

To assist businesses, the California Office of Environmental Health Hazard Assessment (OEHHA) has developed "safe harbour levels" which can be used to determine if the levels present in their products require a warning. These safe harbour levels consist of

- No Significant Risk Levels (NRSL) for chemicals listed as causing cancer
- Maximum Allowable Dose Levels (MADL) for chemicals listed as causing birth defects or other reproductive harm.

In the absence of a safe harbour level, businesses must provide warnings or assess the anticipated exposure to ensure the chemical will not pose a significant risk of cancer or reproductive harm. What is the EUDR?



The European Union Deforestation Regulation (EUDR) is a regulation that aims to reduce deforestation by requiring companies to prove that their products are not contributing to deforestation.





#### Deforestation

Cattle ranching is listed as a key driver of deforestation in South America. It is *reported* that beef and soy production are driving approximately two-thirds of the recorded habitat loss in Brazil's Amazon and Cerrado regions and Argentina and Paraguay's Gran Chaco region.

Nigeria (Cocoa, Palm Oil, Logging) and Indonesia (Palm Oil) also have high levels of deforestation. 95% of West Africa's forests have now been destroyed.

Deforestation is seen as a high priority focus in reducing carbon emissions globally, and preserving forests has become a crucial focal point for many governments.

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#### How do we prove no-deforestation?

Through Traceability and Transparency that is verifiable

**Traceability** is defined as "the ability to identify and trace the history, distribution, location and application of products, parts and materials, to ensure the reliability of sustainability claims, in the areas of human rights, labour (including health and safety), the environment and anti-corruption". 1

1 United Nations Global Compact Office, A Guide to Traceability A Practical Approach to Advance Sustainability in Global Supply Chains (New York, 2014). Available at: <a href="https://d306pr3pise04h.cloudfront.net/docs/issues\_doc%2Fsupply\_chain%2FTraceability%2FGuide\_to\_Traceability.pdf">https://d306pr3pise04h.cloudfront.net/docs/issues\_doc%2Fsupply\_chain%2FTraceability%2FGuide\_to\_Traceability.pdf</a>

Transparency is defined as "relevant information being made available for all elements of the value chain in a harmonized way, which allows for common understanding, accessibility, clarity and comparison". <sup>2</sup>

#### NB: Transparency vs. Disclosure

2 European Commission, A Background Analysis on Transparency and Traceability in the Garment Value Chain (2017)

<a href="https://ec.europa.eu/international-partnerships/system/files/european commission study on background analysis on transparency and traceability in the garment value chain.pdf">https://ec.europa.eu/international-partnerships/system/files/european commission study on background analysis on transparency and traceability in the garment value chain.pdf</a>

#### Benefits of Traceability



Improving supply chain integrity:

Helping to ensure that materials are sourced ethically and that all links in the value chain adhere to standards

Enabling data driven decision making for ethics, efficiency and cost-effectiveness

Enabling consumer confidence through origin of material



Sustainability and Ethical Business Practice:

Ability to track and measure environmental impact (water, energy, waste, transportation, etc)

Animal Welfare assurance for ethical sourcing

Enhanced post-consumer responsibility for recycling and waste options



Enhancing Consumer Trust and Brand Value:

Helping consumers to make informed purchasing decisions

Brand differentiation on demonstration of environmental, social and governance positioning.



Meeting Regulatory and Compliance Expectations:

Ability to align with increasing regulations around ESG, ensuring compliance to avoid penalties and reputational damage

Allowing for enhanced supply chain due diligence for stakeholders, investors and society.

#### EUDR Key Facts

- Entered into force on 29 June 2023, this regulation on deforestation free products is developed with the aim of reducing greenhouse gases and biodiversity loss.
- ➤ It covers key commodities that include soy, <u>beef</u>, palm oil, <u>wood</u>, cocoa, coffee and rubber. It also includes some derived by-products such as <u>leather</u>, chocolate, tyres, <u>paper</u> and furniture.
- > For the leather value chain all materials are included:
  - Raw hides and skins (fresh, salted, dried, limed, pickled or otherwise preserved)
  - Tanned or crust hides and skins of cattle, without hair on, whether or not split, but not prepared.
  - Leather of cattle, further prepared after tanning or crusting, including parchment-dressed leather, without hair on, whether or not split.
- > These obligations extend to traders and manufacturers as well as brands to prove due diligence of deforestation-free supply chains

#### EUDR Obligations as an "Operator"

#### **STEP 1:**

- Collection of information such as:
  - The type of commodity to be made available to the market or export
  - Quantity
  - Supplier
  - Country of production
  - Evidence of legal farming
  - Geographic coordinates of the plots of land where the commodity was produced / grazed.

#### STEP2:

Record the information collected into a risk assessment due diligence system

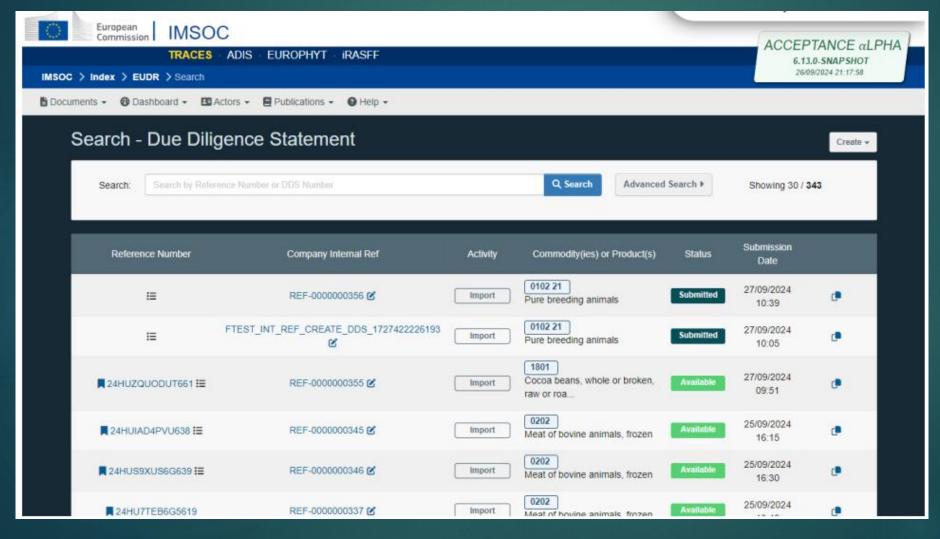
#### **STEP 3:**

Take adequate and proportionate mitigation measures in the event of finding under step 2, a
more than negligible risk of non-compliance to make sure that the risk becomes negligible.



To import or export commodities within the scope of EUDR, operators will require a Universal Unique Identifier (UUID) for customs clearance.





This UUID will be provided once the operator has uploaded a Due **Diligence Statement** (DDS) and Geolocation of all plots of land where the commodity has been raised/grown/ produced into an information system that is now live

A 10 click from start to finish – for a happy flow (i.e. if everything is entered correctly).

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- 1. Log in to system
- 2. Reference Number: if you do not add your own, then the system will assign one automatically.
- 3. Activity (import, export, domestic)
- 4. Operator/Trader Name and Address
- 5. Place of Activity (country of activity or entry to the EU this can be copied from Operator details)
- 6. Any additional information (not mandatory for use)
- 7. Commodities or Products (there is a list of Codes for pre-populated commodities)
  - Quantity, Weight, Description, Area, Supplementary Units (if required)
- 8. Production Place (here you can either upload a GeoJson file that has been pre-prepared, or you can use the Map Tool in the system to navigate and zoom into an area to select and then define enclosed areas using the polygon tool.
- 9. Add the Country of Production
- 10. Submit, check and confirm submission

It is possible to register and test API links, both in a test environment and in the full production server.





### Information system API for Economic Operators

- 1. Echo Service Basic connectivity test
- Submit DDS DDS submission service
- 3. Retrieve DDS DDS reference and status retrieval
- 4. Error Management DDS submit error conditions
- 5. Amend DDS Service to amend DDS data
- 6. Retract DDS Service to "Cancel" or "Withdraw" a DDS
- 7. Get DDS Service to retrieve DDS data via the Reference and Verification numbers

So far there have been approximately 3000 registrations (not many in the wider context of operators who import and export to/from the EU).

There have been 32,000 submissions – with most of them being via API so there is a confidence that the system works.

Process for registration – first to test, then for production.



### Information system API for Economic Operators

Service Provider platform for Operators to submit DDS, with Service Provider being a <u>public</u> or <u>private</u> organisation

- Platform admin creates test account (EU Login + Web Service user) in EUDR Acceptance
- More than one account may be required to simulate many operators
- Platform admin contacts SANTE Support to get Web Service access in EUDR Acceptance for those accounts
- Platform admin passes Conformance Tests 1-4 (or more)
- Operators create account in EUDR Production
- Operators contact SANTE support to get Web Service access in EUDR Production (mentioning the Service Provider platform they will use)
- o Operators provide the credentials to the Service Provider Platform admin

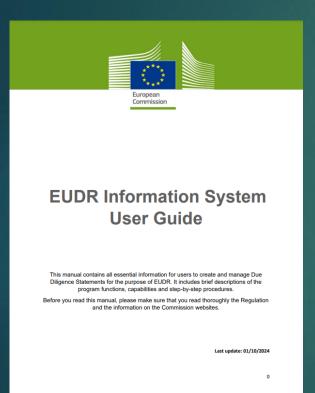


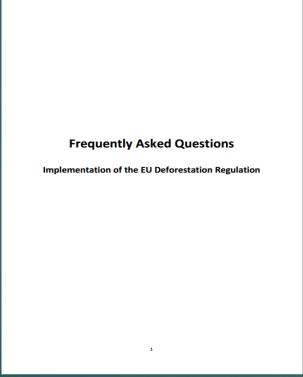
Any authorised representative, public or private, MUST be established in the EU.

#### EUDR Help and Support

The European Commission has a raft of resources now in place to support preparation and understanding. <a href="https://green-business.ec.europa.eu/deforestation-regulation-reg



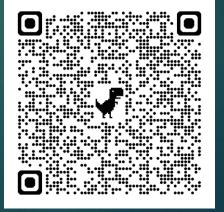






Virtual training sessions available every month. There is availability currently

Current Version 3. Version 4 expected April 25



Available in all European languages

#### **EUDR New Guidance**

- > An additional resource document is now available.
  - > 10 different supply chain scenarios to assist with understanding the obligations for actors positioned at different points of the supply chain.
  - ➤ This is a guidance document only and is not legally binding but designed to smooth the entry into application.
- ➤ Version 4 of the FAQs will be published in April, following the input and suggestions received from members of the Deforestation Platform and Member States representatives.
  - > How to ascertain the due diligence exercised
  - > Aligning the timeframes with the new dates of application
  - Clarification of the role of small and medium operators
  - > FAQs are currently available in English, French and German. Spanish is planned.
  - Clarification of Company Groups
  - > Validity periods for DDS covering multiple shipments and multiple customs applications
  - > Additional clarification on technical details for the information system.
- The Country Risk Profiling is on schedule to be completed within the legal deadline of 30<sup>th</sup> June 2025. If a Country is allocated a low risk profile, then simplified due diligence measure will be expected.

#### 3. EU Deforestation Regulation (EUDR)

Timeline:

2023 2025

2026

2020

Regulation entered into force on 29 June 2023

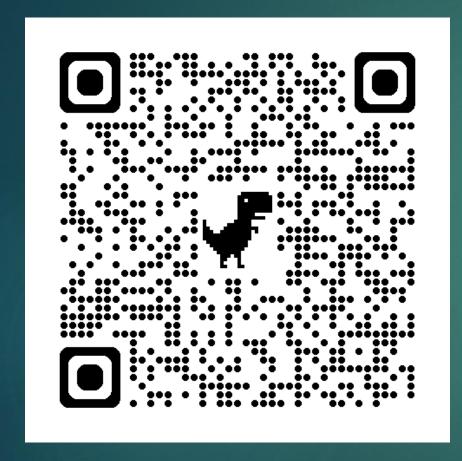
30 December 2025
effective application
for large and
medium sized
companies

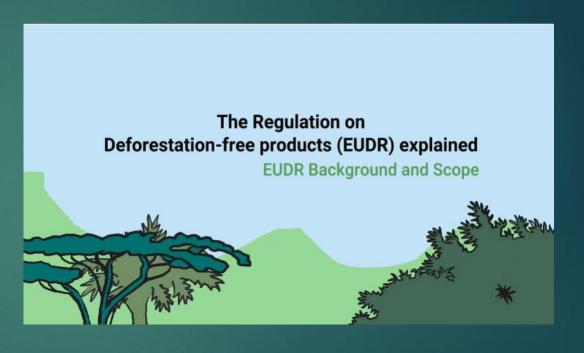
30 June 2026
effective application
date for micro and
small enterprises

31<sup>st</sup> December 2020 is the sunset date for deforested land

### European Commission EUDR web page









## 10 minute break

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### EU Green Claims Directive (EUGCD)

# Factors that have changed the consumer behaviours over three decades:

- 1. Availability we are bombarded with choice far beyond our need
- 2. Exposure travel and the internet have given us all so much more knowledge about foods from different parts of the world, products, materials and ways of living
- **3. Wealth Generation** for business, a society that is motivated by profit needs to keep growing business to keep growing profit. For individuals, as income increases so does the temptation to spend more due to aspirational wants and society demands
- **4. Marketing** this is perhaps the biggest driver of over-consumption the constant exposure to advertising and messaging is all designed to make us buy more than we need





#### EU Green Claims Directive (EUGCD)

#### **Key Points:**

- ➤ Officially known as the Directive on the Verifiability and Communication of Environmental Product Claims.
- ➤ In 2020 there were around 230 active "ecolabels" in Europe, but the concern arises over whether consumers or companies can be sure that the claims are based on solid grounds.
- ➤ The EU found that 53% of the claims that it examined were vague, misleading or unfounded and 40% were unsubstantiated.
- ➤ The proposed directive sets detailed rules around substantiating and communicating explicit environmental claims about products, in business to consumer communications.
- > It will apply to voluntary claims and labelling schemes.



#### 4. EU Green Claims Directive (EUGCD)

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Under the Directive, companies will have to carry out an assessment to substantiate explicit environmental claims and meet certain criteria.

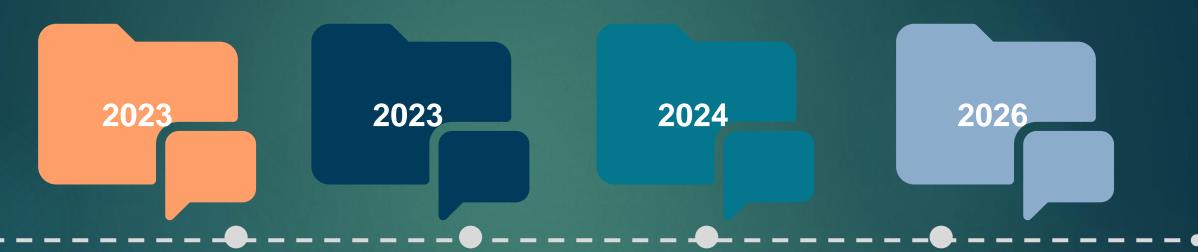
Additionally, companies will also have to comply with the following requirements:

- use equivalent information and data for the assessment;
- use data that is generated or sourced in an equivalent manner;
- cover the same stages along the value chain;
- cover the same environmental impacts, aspects or performances;
- use the same assumptions.

## 4. EU Green Claims Directive (EUGCD)

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## Timeline:



Proposal for a Directive put forward on 22 March 2023

Public Consultation ended 21 July 2023 and draft proposal submitted on 9 November 2023

Proposal adopted at the Plenary Session on 26 March 2004 – Implementation into national laws by 27 March 2026 for compliance from 27 September 2026.

If you can't prove it, don't say it!

# Digital Product Passport

- The Digital Product Passport (DPP) is a digital document, accessible via a data carrier like a QR code or RFID tag, that provides information about a product's origin, materials, environmental impact, and disposal guidelines, aiming to enhance transparency and circularity across the supply chain.
- The DPP is part of a larger raft of EU regulation under the "Ecodesign for Sustainable Products Regulation" (ESPR), which is aimed at promoting sustainable products and reducing environmental impact.
- The regulation came into effect on 18 July 2024 and has a phased in timeline for implementation in industry from 2026 to 2030.
- ➤ The regulation applies to all brands that sell in the EU in particular, companies in the apparel, footwear, electronics, batteries, construction materials, furniture and chemical industries.







# Digital Product Passport

- The type of information that will be "stored" in the DPP is:
  - Basic product information (name, model, make, batch number, date of manufacture and any warranty information)
  - > A unique product identifier that will identify each product
  - Material data such as the origin of raw materials and components – including the suppliers involved in the value chain
  - ➤ Material Composition a list of all the materials that have been used in the manufacturing with additional information on whether a component or material is recyclable, biodegradable and whether the material itself is a recycled material
  - Environmental Impact any details such as carbon footprint, resource use and potential for pollution
  - Sustainability certifications such as SLF audit certification that mitigate the impact / risk of the product.

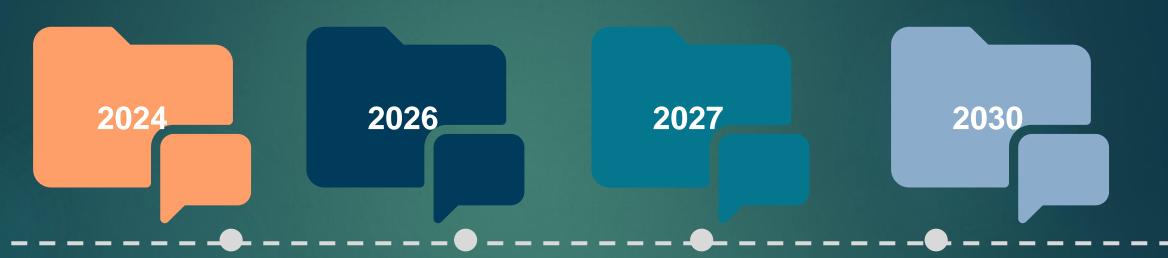




# Digital Product Passport

Timeline:





Ecodesign for
Sustainable Products
Regulation (ESPR) came
into effect on 18 July
2024

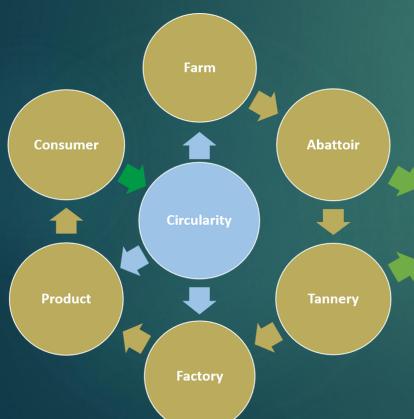
Delegated Acts will be adopted, and Batteries will be the first category to have legal enforcement

First wave of industries including batteries, vehicles, textiles, electronics, furniture, plastics, construction and chemicals will comply

All companies will have until 2030 to fully implement the DPP

# Sustainable Leather Foundation

SLF's Core Vision





Established in 2020 a global foundation providing certification, equivalency and education services for the benefit of all stakeholders in the leather industry.



At the heart of the foundation is the SLF
Transparency
Dashboard™ that displays a holistic ESG profile for the leather value chain.



A consumer accessible window to sustainability linking the value chain to industry experts and innovative tools.

Byproducts

We provide tangible solutions for the whole leather value chain to communicate & build upon all your ESG requirements



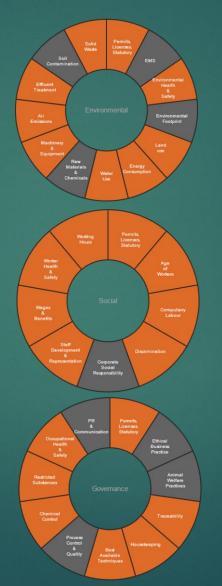
www.sustainableleatherfoundation.com

# The A.I.M Approach – Accessible, Inclusive, Modular

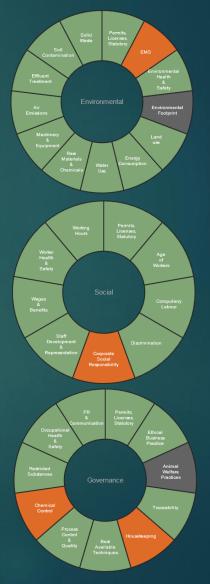
## October 2021



## **March 2022**



## **June 2022**







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Our Wo

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Partner Resources

Consumer Resources

DASHBOARD

Welcome To The Sustainable Leather Foundation

# Supporting The Leather Industry To Protect For Future Generations

The Sustainable Leather Foundation will be exhibiting and presenting at APLF Hong Kong from the 12th – 14th of March 2025.

Come visit us in Hall 3C, Stand E10

# A sustainable vision for the leather industry

The leather industry benefits from many organisations and associations who work to support the leather industry, some specific to region or specialist area. However, there is a need for a cohesive organisation that can holistically combine the efforts of the industry with the needs of the consumers, and society in general; working to address the industry's current and future responsibilities.

#### responsibilities.

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# SMYTHSON

SUSTAINABILITY

#### WHAT IS SUSTAINABILITY?

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Sustainability means achieving a balance between the needs of today and the demands of tomorrow.

It requires us to look beyond short-term gains and consider the long-term impacts of our actions on the planet and on future generations. Businesses must lead the way in adopting sustainable practices. They have the power and the responsibility to drive change and inspire others to follow suit."

#### MISSION STATEMENT

At Smythson, our goal is to offer exceptional, luxury products while contributing towards conserving our world for generations to come.

We recognise that people play a critical role in our success and, as a collective, we have a responsibility towards our employees, colleagues, supply chain partners, customers, and the wider communities in which we operate.

By working together to integrate sound sustainable practices into every aspect of our business, we can strive to achieve the highest quality standards, drive sustainable outcomes, and minimise the environmental impact of our operations.







#### K E Y M I L E S T O N E S



Proudly certified since 2020 with Positive Luxury's Butterfly Mark in recognition of our sustainability standards.



One of only seven companies to be granted both HRH King Charles and HRH Queen Camillla's Royal Warrants.



Launched our Evergreen refillable products range, promoting product circularity, reducing waste.

25%

Reduction in our scope 1 & 2 operational footprint between 2019 and 2023.



An ongoing 3+ year partnership with the National Literacy Trust.



#### WHAT WE'RE WORKING ON

#### CREATING A BRILLIANT CULTURE



Driving employee well-being and satisfaction.



Increasing training and development opportunities

#### HELPING COMMUNITIES THRIVE



Working with charities that share common ambitions, i.e. literacy and biodiversity.



Providing employees with opportunity to partake in community activities.



Providing supplier support and collaborative engagement on sustainability.



Understanding our customers; what they want and need both now and in 20 years.

#### IN ACTION

## Healthy, Happier People

We are prioritising employee engagement and satisfaction through forums like 'Tell Frank', and by improving staff benefits.

We are increasing training opportunities (Modern Slavery and Leather training).





#### WHAT WE'RE WORKING ON

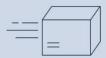
## IMPROVING LOGISTICS (CARBON AND PACKAGING)



Achieve zero plastics on B2C sales.



Reduce plastics on inbound shipments.



Reduce shipping associated carbon.



Drive efficiencies.

#### PROTECTING BIODIVERSITY



Drive responsible sourcing to reduce impacts on worldwide biodiversity, especially deforestation.



Eliminate intentionally added PFAS (synthetic chemicals) from our supply chain and be PVC free.

#### IN ACTION

### Planet Protection

We will be introducing recycled pulp for the paper used on our branded packaging.

Exploring plastic alternatives and more efficient designs for our packaging.





#### INCREASING SUSTAINBALE SOURCING



Reducing product related carbon, water and waste.



Responsible sourcing from the start of product design and development process.

#### MEETING AND EXCEEDING STANDARDS



Staying ahead of global compliance.



Upholding relevant sustainability standards and excellent quality management.

## ENCOURAGING PRODUCT CIRCULARITY AND AFTERCARE



Increasing the longevity and circularity of products.

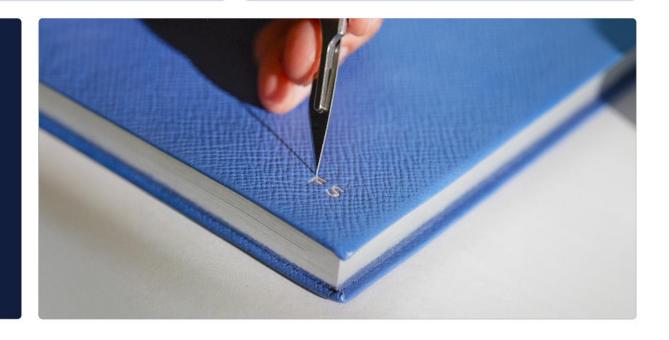
#### IN ACTION

## Meeting & Exceeding Standards

We are carrying out compliance checks with Design and Tivoli PD at the start of every season.

Building and expanding our risk register.

Improving traceability.



## Be Prepared

It is imperative that organisations understand where their risks are and how they can mitigate those risks without creating additional unintended consequences.

**Questions?** 



**More information:** 

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