PRODUCT RESTRICTED SUBSTANCES LIST (PRSL)

C & J Clark International Limited, 40 High Street, Street, Somerset, England, BA16 0EQ

Clarks operates a robust chemicals management programme for our products and has a well-established Product Restricted Substances Policy (Containing the PRSL) which both restricts and sets limits for the types of chemical substances that may be contained within our finished products.

Our PRSL is based on stringent requirements from across our global markets, including REACH, CPSIA and California Proposition 65. The policy is applicable to all products that are branded Clarks*. Our PRSL is reviewed annually in line with global regulatory updates as well as to ensure that it represents the most relevant substances for our products.

We implement our PRSL via a test programme with extensive testing of our products, materials and components, through an approved global network of recognised third-party laboratories. Clarks is committed to responsible chemicals management and will continue to research, monitor and educate our supply chain in all aspects related to our PRSL.

The PRSL below provides an overview of the following:

- Substance names: Which are prohibited or restricted and how they are commonly referred to.
- CAS numbers: A globally recognised (number reference) registry of unique chemicals substances.
- Material classifications (e.g., leather): The material categories in which substances are most likely to occur.
- Test methods: The most currently recognised test method that is used to analyse for substances.
- Limits: The current Clarks policy limits for the relevant substances.

Definitions:

- CPSIA – Consumer Product and Safety Improvement Act (US): Signed into US law in August 2008 it imposes requirements for consumer products imported into the US, particularly those intended for children.

- The California Safe Drinking Water and Toxic Reinforcement Act 1986: Commonly referred to as "Proposition 65," is a product safety law which applies to all consumer products distributed within the state of California

- None-Detectable: The substance is not able to be detected above the recognised detection limit of the test method.

- Parts per million (ppm): This is a common unit used to state low concentration levels of substances, for example 1000ppm is equal to 0.1%.

- REACH (Registration, Evaluation, and Authorisation of Chemicals) regulation (EU) no.1907/2006: Came into force in June 2007, it aims to improve the protection of human health and the environment from the risks of chemicals and to maintain the competitiveness of EU industry.

* Products distributed in Australia are done so through a licensed partner who manage and control a separate Restricted Substances policy.

For queries regarding the PRSL please contact csr@clarks.com

Restricted Substance	CAS No.	1. Leather	2. Textiles (Natural)	3. Textiles (Synthetic)	4. Cellulose	5. Rubber	6. Plastic	7. Adhesive	8. Metal	9. Paint	10. Electrical	11. Packaging	Method (or equivalent)	Clarks Limit
Azo Dyes	See Appendix 1	♦	♦	♦									BS EN ISO 17234-1/2:2015/11 (Leather) BS EN 14362-1/3: 2017 (Textiles) GB/T 17592 / GB/T 23344 (China standard)	Textiles: 20ppm All other materials: 30ppm
Chloroalkanes, C10-C13	85535-84-8	♦				♦	♦						BS EN ISO 18219:2015	1500ppm (0.15%) (Sum of C10-C13)
Chrome VI	18540-29-9	♦											BS EN ISO 17075-1:2017 BS EN ISO 17075-2:2017 (Preferred) ISO 10195:2018 A2 (Pre-ageing, not required unless otherwise stated)	3ppm
DMFu	624-49-7	♦	♦	♦	♦	♦	♦			♦		♦	PD CEN ISO/TS 16186:2012	None-detectable (detection limit: 0.1ppm)
Disperse Dyes	See Appendix 2			♦									DIN 54231:2005-11 BS EN ISO 16373-2:2014 (Textiles)	None-detectable (detection limit: 15ppm)
Formaldehyde	50-00-0	♦	♦	♦	♦			♦					BS EN ISO 17226-1:2008 (HPLC) (Leather) BS EN ISO 14184-1:2011 (Textile) ISO 27587:2009 (Formulations)	Textile Infants:16ppm Leather Infants:20ppm All other Materials: 75ppm
Heavy Metals (Extractable Content) Levels assume a solid is being tested	See Appendix 3	♦	♦	♦	♦	♦	♦		♦	♦	♦	♦	BS EN71-3:2013 + A3:2018	Al: 70,000ppm, Sb:560ppm, As:47ppm, Ba: 18,750ppm, B: 15,000ppm, Cd:17ppm, CrIII:460ppm, CrVI:0.053ppm, Co:130ppm, Cu: 7,700ppm, Pb:23ppm, Mn: 15,000ppm, Hg:94ppm, Ni:930ppm, Se:460ppm, Sr: 56,000ppm, Sn: 180,000ppm, Organic Tin:12ppm, Zn: 46,000ppm
Heavy Metals (Total Content)	7440-43-9, 7439-92-1, 7439-97-6, 7440-38-2	♦	♦	♦	♦	♦	♦		♦	♦	♦	♦	ISO 17072-2:2011 or as specified by U.S. CPSIA BS EN 16711-1:2015 (Textiles)	Cd, Pb, Hg, As: 90ppm in material, coating & substrate
Nickel	7440-02-2								♦				BS EN 12472:2005 + A1:2009 (Pre-treatment) BS EN 1811:2011 + A1:2015 (Migratable)	0.5µg /cm^2/wk
Nitrosamines	See Appendix 4					♦							ISO/CD 19577	None-detectable (detection limit: 0.1ppm)
Nonylphenols, Octylphenols & their Ethoxylates (NP, NPEO, OP, OPEO): Alkylphenol & Alkylphenol Ethoxylates	See Appendix 5	♦	♦	♦									BS EN ISO 18218-2:2015 (Leather/textile) BS EN ISO 18218-1:2015 (Leather only) BS EN ISO 18254-1:2016 (Textile only)	100ppm If NPEO/OPEO is 'none detected' in BS EN ISO 18218-1:2015 or BS EN ISO 18254-1:2016 then NP/OP not present either.
Organotins: DBT, DOT, TBT, TPhT, TBTO, MBT, DBTC	See Appendix 6	♦	♦	♦	♦	♦	♦			♦	♦		CEN ISO/TS 16179:2012	1ppm per type
Pesticides	See Appendix 7	♦	♦										Extraction by organic solvent, EPA 8081	1ppm

Restricted Substance	CAS No.	1.Leather	2.Textiles (Natural)	3.Textiles (Synthetic)	4.Cellulose	5. Rubber	6. Plastic	7. Adhesive	8. Metal	9. Paint	10. Electrical	11. Packaging	Method (or equivalent)	Clarks Limit
PFOS & PFOA	2795-39-3, 3825-26-1	♦	♦	♦						♦			PD CEN/TS 15968:2010 (Textile) EN ISO 23702-1 (Leather) pending publication	None-detectable Total less than 1µg/m^2 of the coated material (Reporting limit accepted of 0.025ppm)
Phenols (Chlorinated) PCP,TeCP	87-86-5, 25167-83-3, 935-95-5	♦	♦	♦									BS EN ISO 17070:2015	All materials: 0.5ppm
Phthalates: (DEHP, DBP, BBP, DINP, DIDP, DNOP, DIBP, DnHP, DHNUP, DIHP, DHP, DMEP, DIPP, NPiPP, DPP, DCHP, 1,2-Benzenedicarboxlyic acid, dipentylester, branched and linear. 1,2-Benzenedicarboxlyic acid, dihexylester, branched and linear.	See Appendix 8	♦ *		♦		♦	♦	♦		♦			BS EN 14372:2011 (Polymers) BS EN ISO 14389:2014/ CPSC-CH-C001-09-4 (Textiles/American standard)	1000ppm total (combined phthalates)
PAH	See Appendix 9					♦	♦						AfPS GS 2014:01 / GC-MS (No internationally agreed method) Draft method: PD CEN ISO/TS 16190:2013	1ppm by weight of component for REACH listed PAH, in rubber and plastic, materials in contact with the skin only.

* Patent/Coated leather only.

Appendix 1
Azo Dyes

Chemical	CAS no
4-Aminobiphenyl	92-67-1
Benzidine	92-87-5
4-Chlorotoluidine	95-69-2
2-Naphthaylamine	91-59-8
o-Aminoazotoluene	97-56-3
2-Amino-4-nitrotoluene	99-55-8
4-Chloroaniline	106-47-8
2,4' Diaminoanisole	615-05-4
4,4'-Diaminodiphenylmethane	101-77-9
3,3'-Dichlorobenzidine	91-94-1
3,3'-Dimethoxybenzidine	119-90-4
3,3'-Dimethylbenzidine	119-93-7
3,3'-Dimethyl-4,4'diaminodiaphenylmethane	838-88-0
4-Cresidine	120-71-8
4,4'-Methylenebis-(2-Chloroaniline)	101-14-4
4,4'-Oxydianiline	101-80-4
4,4'-Thiodianiline	139-65-1
2-Toluidine	95-53-4
2,4 Diaminotoluene	95-80-7
2,4,5-Trimethylaniline	137-17-7
2-Aminoanisole	90-04-0
4-Amino azobenzene	60-09-3
2,4 – Xylidine	95-68-1
2,6 – Xylidine	87-62-7

Appendix 2
Disperse Dyes

Chemical	CAS no
Disperse Blue 1	2475-45-8
Disperse Blue 3	2475-46-9
Disperse Blue 7	3179-90-6
Disperse Blue 26	3860-63-7
Disperse Blue 35	12222-75-2
Disperse Blue 102	69766-76-6
Disperse Blue 106	12223-01-7
Disperse Blue 124	61951-51-7
Disperse Brown 1	23355-64-8
Disperse Orange 1	2581-69-3
Disperse Orange 3	730-40-5
Disperse Orange 11	82-28-0
Disperse Orange 37	12223-33-5
Disperse Orange 76	13301-61-6
Disperse Orange 59	51811-42-8
Disperse Orange 149	85136-74-9
Disperse Red 1	2872-52-8
Disperse Red 11	2872-48-2
Disperse Red 17	3179-89-3
Disperse Yellow 1	119-15-3
Disperse Yellow 3	2832-40-8
Disperse Yellow 9	6373-73-5
Disperse Yellow 23	6250-23-3
Disperse Yellow 39	12236-29-2
Disperse Yellow 49	54824-37-2
Acid Red 26	3761-53-3
Basic Red 9	569-61-9
Basic Green 4	569-64-2
	2437-29-8
	10309-95-2
Basic Violet 3	548-62-9
Basic Violet 14	632-99-5
Basic Blue 26	2580-56-5
Direct Black 38	1937-37-7
Direct Blue 6	2602-46-2
Direct Red 28	573-58-0
Direct Brown 95	16071-86-6
4-Dimethylaminoazobenzene (Solvent Yellow 2)	60-11-7

Appendix 3
Heavy Metals (Extractable)

Chemical	CAS no
Aluminium (Al)	7429-90-5
Antimony (Sb)	7440-36-0
Arsenic (As)	7440-38-2
Barium (Ba)	7440-39-3
Boron (B)	7440-42-8
Cadmium (Cd)	7440-43-9
Chrome III (CrIII)	1308-38-9
Chrome VI (CrVI)	18540-29-9
Cobalt (Co)	7440-48-4
Copper (Cu)	7440-50-8
Lead (Pb)	7439-92-1
Manganese (Mn)	7439-96-5
Mercury (Hg)	7439-97-6
Nickel (Ni)	7440-02-2
Selenium (Se)	7782-49-2
Strontium (Sr)	7440-24-6
Tin (Sn)	7440-31-5
Organic Tin	Various
Zinc (Zn)	7440-66-6

Appendix 4
Nitrosamines

Chemical	CAS no
N-nitrosodimethylamine (NDMA	62-75-9
N-nitrosodiethylamine (NDEA)	55-18-5
N-nitrosodipropylamine (NDPA)	621-64-7
N-nitrosodibutylamine (NDBA)	924-16-3
N-nitrosopiperidine (NPIP)	100-75-4
N-nitrosopyrrolidine (NPYR)	930-55-2
N-nitrosomorpholine (NMOR)	59-89-2
N-nitroso N-methyl N-phenylamine (NMPhA)	614-00-6
N-nitroso N-ethyl N-phenylamine (NEPhA)	612-64-6

Appendix 5
Nonylphenols, Octylphenols and their Ethoxylates

Chemical	CAS no
Nonylphenol (NP), mixed isomers	104-40-5, 11066-49-2, 25154-52-3, 84852-15-3
Octylphenol (OP), mixed isomers	140-66-9, 1806-26-4, 27193-28-8
Octylphenol Ethoxylates (OPEOs)	9002-93-1, 9036-19-5, 68987-90-6
Nonylphenol Ethoxylates (NPEOs)	9016-45-9, 26027-38-3, 37205-87-1, 68412-54-4, 127087-87-0

Appendix 6
Organotins

Organotin	CAS no.
Dibutyltin (DBT)	1002-53-5
Dioctyltin (DOT)	250252-87-0
Tributyltin (TBT)	36643-28-4
Triphenyltin (TPhT)	668-34-8
Bis(tributyl)tin (TBTO)	56-35-9
Monobutyltin (MBT)	78763-54-9
Dibutylitin Dichloride (DBTC)	683-18-1

Appendix 7
Pesticides

Pesticide	CAS no.
2-(2,4,5-trichlorophenoxy) propionic acid, its salts and compounds	93-72-1
2,4,5-T	93-76-5
Aldrine	309-00-2
Azinophosmethyl	86-50-0
Azinophosethyl	2642-71-9
Bromophos-ethyl	4824-78-6
Captafol	01/06/2425
Carbaryl	63-25-2
Chlordane	57-74-9
Chlordimeform	6164-98-3
Chlorfenvinphos	470-90-6
Cyfluthrin	68359-37-5
Cyhalothrin	91465-08-6
Cypermethrin	52315-07-8
Deltamethrin	52918-63-5
DDD	53-19-0
	72-54-8
DDE	3424-82-6
	72-55-9
DDT	50-29-3
	789-02-6
Diazinone	333-41-5
Dicrotophos	141-66-2
Dieldrine	60-57-1
Dimethoate	60-51-5
Dinoseb, its salts and acetate	88-85-7
Endosulfan	115-29-7
Endosulfan I (alpha)	959-98-8
Endosulfan II (beta)	33213-65-9
Endrine	72-20-8
Ethylparathione	56-38-2
Fenvalerate	51630-58-1
Halogenated biphenyls, including	1336-36-3
Polychlorinatedbiphenyl (PCB)	53469-21-9

Pesticide	CAS no.
Halogenated terphenols, including polychlorinated terphenyl (PCT)	Various
Halogenated naphthalenes, including polychlorinated naphthalenes (PCNs)	Various
Halogenated diarylalkanes	Various
Halogenated diphenyl methanes, including Monomethyl-dibromo-diphenyl methane, Monomethyl-dichloro-diphenyl methane, and Monomethyl-tetrachloro-diphenyl methane	99688-47-8
	81161-70-8
	76253-60-6
Heptachlor	76-44-8
Heptachloroepoxide	1024-57-3
Hexabromobiphenyl	36355-01-8
a-Hexachlorocyclohexane with and without Lindane	319-84-6
b-Hexachlorocyclohexane with and without Lindane	319-85-7
g-Hexachlorocyclohexane with and without Lindane	58-89-9
Hexachlorobenzene	118-74-1
Isodrine	465-73-6
Kelevane	4234-79-1
Kepone	143-50-0
Lindane	58-89-9
Malathione	121-75-5

Appendix 8
Phthalates

Phthalates	CAS no.
Di (2-ethyl hexyl) phthalate (DEHP)	117-81-7
Dibutyl phthalate (DBP)	84-74-2
Benzyl butyl phthalate (BBP)	85-68-7
Di-isononyl phthalate (DINP)	28553-12-0 68515-48-0
Di-isodecyl phthalate (DIDP)	26761-40-0 68515-49-1
Di-n-octyl phthalate (DNOP)	117-84-0
Di-isobutyl phthalate (DIBP)	84-69-5
Di-n-hexyl phthalate (DnHP)	84-75-3
1,2-Benzenedicarboxylic acid, di-C7-11-branched and linear alkyl esters (DHNUP)	68515-42-4
1,2-Benzenedicarboxylic acid, di-C6-8-branched alkyl esters, C7-rich (DIHP)	71888-89-6
Bis(2-methoxyethyl) phthalate (DMEP)	117-82-8
Diisopentylphthalate (DIPP)	605-50-5
N-pentyl-isopentylphthalate (NPiPP)	776297-69-9
Dipentyl phthalate (DPP)	131-18-0
1,2-Benzenedicarboxlyic acid, dipentylester, branched and linear	84777-06-0
1,2-Benzenedicarboxlyic acid, dihexylester, branched and linear (DHP)	68515-50-4
1,2-Benzenedicarboxlyic acid, di-C6-10-alkyl esters	68515-51-5
Dicyclohexyl phthalate (DCHP)	84-61-7

Appendix 9
Polycyclic Aromatic Hydrocarbons

Polycyclic Aromatic Hydrocarbons	CAS no.
Benzo[a]pyrene (BaP)	50-32-8
Benzo[e]pyrene (BeP)	192-97-2
Benzo[a]anthracene (BaA)	56-55-3
Chrysene (CHR)	218-01-9
Benzo[b]fluoranthene (BbFA)	205-99-2
Benzo[j]fluoranthene (BjFA)	205-82-3
Benzo[k]fluoranthene (BkFA)	207-08-9
Dibenzo[a,h]anthracene (DBAhA)	53-70-3
Benzo(g,h,i)perylene	191-24-2
Indeno(1,2,3-c,d)pyrene	193-39-5
Acenapthylene	208-96-8
Acenapththen	83-32-9
Fluorene	86-73-7
Phenanthrene	85-01-8
Pyrene	129-00-0
Anthracene	120-12-7
Fluoranthene	206-44-0
Naphthalene	91-20-3