Animal-Derived Materials Policy

June 2018 Version
Introduction
Columbia Sportswear Company (CSC) and each of its subsidiaries and brands are committed to welfare of animals as they relate to our products. However, we recognize this must be a shared effort and we depend on our partners throughout the supply chain to support our mission. This policy outlines the responsibilities with respect to the use of animal-derived materials in products produced for CSC and its subsidiaries and brands including Columbia Sportswear, Mountain Hardwear, prAna and Sorel.

Scope
The standards in this policy apply to all apparel, accessories, equipment, footwear, and other products containing animal-derived materials\(^1\) and are designed, sourced or manufactured for or by CSC or its affiliated brands. In addition, these standards apply to all carry over designs and must be reviewed for compliance.

CSC requires all involved with the design, development and manufacturing of products containing animal-derived materials to be aware of the standards set forth in this policy and ensure that all the materials and finished goods meet the applicable standards including all laws, rules, and regulations. As part of other programs, CSC may require material traceability documentation to ensure responsible sourcing. The guidance in this policy is based on global industry standards and regulations. Additional requirements for animal-derived materials such as requirements set by individual customers, distributors or distributor countries may apply. The scope of this policy does not include any approved inputs used for recycled animal-derived materials in CSC products (e.g. recycled wool).

Policy on Textiles, Fibers and Skins Derived from Animals
Overall Guidance:

- Upon request, suppliers must provide documentation of the source for any animal-derived material supplied to CSC.

\(^1\) Key animal-derived material definitions are listed in Appendix 1.
• Products must not be manufactured with or contain materials from any species of plant or animal identified as endangered or threatened according to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES I, II, III), The International Union for Conservation of Nature (IUCN) Red List of Threatened Species™, and the Endangered Species Act (ESA).

• Products must not be manufactured with or contain domesticated dog and cat fur, and must comply with 19 U.S. Code § 1308 - Prohibition on importation of dog and cat fur products.

• No animal-derived materials from aborted animals of any species, including Karakul lamb.

• No animal-derived materials may come from wild or domestic animals which were killed solely for their hides.

• Real fur is prohibited. Items such as fleece, sheepskin, hair-on cowhide, and sheep shearling are considered hides with hair attached and are not included in the definition of prohibited fur.

• No use of exotic skin is permitted. Allowable species include domesticated cow, goat, sheep, buffalo, and pig. If any other animal skins are to be considered it is mandatory to consult with Corporate Responsibility Team.

**Leather:**

• Leather may not be sourced from illegally deforested areas in the Amazon biome. Upon request, suppliers must provide material source documentation and certification stating that they have policies and compliance practices in place to prohibit and prevent purchase of rawhides from the cattle raised in the Amazon basin.

**Down & Feathers:**

• Down and feathers may not be sourced from live-plucked waterfowl or from farms that practice force-feeding methods for foie gras.

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2 Please see Appendix 2.
3 Please see Appendix 3.
4 Please see Appendix 4.
5 Please see Appendix 1 for a glossary of terms that define “Real fur”.
• The Responsible Down Standard (RDS) is an acceptable standard to meet the compliance of down and feather animal welfare criteria.

Wool:
• No products or materials shall contain material derived from the sources that use the practice of mulesing.
• The Responsible Wool Standard (RWS) is an acceptable standard to meet the compliance of wool animal welfare criteria.

Animal Hair:
• No use of angora rabbit wool is permitted.
• No use of angora goat mohair is permitted.
• No products or materials sold or transferred to CSC shall contain fur obtained from sources using “live pulled” fur down to the skin. Frequency of shearing must be limited to maintain body warmth and positive living conditions.
• No animal-derived materials from animals reared in cages for their hair, fur, fibers, and skins.

Policy on Global Sourcing of Farm-Raised Animals for Textile, Fibers, and Skins Derived from Animals
We expect any farm-raised animal-derived material source to comply with the five freedoms:

1. Freedom from hunger or thirst by ready access to fresh water and a diet to maintain full health and vigor.
2. Freedom from discomfort by providing an appropriate environment including shelter and a comfortable resting area.
3. Freedom from pain, injury or disease by prevention or rapid diagnosis and treatment.
4. Freedom to express normal behavior by providing sufficient space, proper facilities and company of the animals own kind.
5. Freedom from fear and distress by ensuring conditions and treatment that avoid mental suffering.
Species Identification
CSC may require testing to identify the species of animal-derived materials to ensure compliance with the standards and regulations such as the Endangered Species Act (ESA) and the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Upon request, samples must be submitted to a CSC approved 3rd party laboratory and samples should be taken from the first production lot unless otherwise specified. The testing procedure is as follows:

- Submit animal-derived materials (~20g or 150cm yard) to CSC approved lab (i.e. SGS Hong Kong or as determined by Global Product Compliance).
- Apply species identification testing for animal-derived materials and request test method MALDI-TOF using Keratin Structures (SIAM) or another applicable test method.
- The resulting species match must be 100%.
- If any failure, immediately inform the CSC Global Product Compliance and relevant liaison office materials research team and complete the failure remediation process as outlined in the CSC Restricted Substance Manual (RSL) and Product Safety Manual.

Collaboration
As an innovator within the outdoor apparel industry, we are involved in on-going research, development and testing for alternatives to animal-derived materials in partnership with several vendors and materials labs. We realize that there may be additional processes that we can implement in the future that would provide greater assurances about the sources of our raw materials. The development of our Animal Derived Materials Policy included several stakeholders such as industry groups and animal welfare organizations. We are committed to the progression and advancement of global industry standards, to continuing to innovate around synthetic alternatives, and to working with our vendors and independent manufacturers to promote and reward adherence to industry protocols and responsible standards across Columbia’s supply chain.

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6 The requirement is 100% species match unless specified.
7 Chemical testing may be required, please refer to the Columbia Sportswear Company Restricted Substance List and Product Safety Manual. In addition, please ensure all real fur requirements are communicated to the Product Compliance Team.
Appendix 1 – Glossary of Terms

**Animal welfare** – the humane and responsible treatment of animals which is ensured by those people in relationship with those animals.

**Force Feeding** – a process known as gavage and a practice which fattens a goose or duck's liver by force feeding fodder with a feeding tube.

**Live Plucking** – any removal of down and feathers from live birds.

**Mulesing** – the process of removing folds of skin from the tail area of a sheep, intended to reduce fly strike.

**Real fur** – animal skin or part thereof with hair, fleece, or fur fibers attached thereto, either in its raw or processed state, but shall not include such skins that are to be converted into leather (e.g. hair-on cowhide, sheepskin, sheep shearling, leather) or to be clipped, shorn or combed from live animals (e.g. wool, mohair).

Appendix 2 – Further Description of CITES I, II, and III Species

Within the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), there are lists of species, which are afforded different levels of protection from over-exploitation and are labeled as Appendices I, II, and III.

Appendix I species includes the most endangered among the CITES-listed animals and plants. These species are threatened with extinction, which are or may be affected by trade. Trade in specimens of these species must be subject to particularly strict regulation in order not to endanger further their survival and must only be authorized in exceptional circumstances.

Appendix II includes:

a) All species which although not necessarily now threatened with extinction may become so unless trade in specimens of such species is subject to strict regulation in order to avoid utilization incompatible with their survival; and

b) Other species that must be subject to regulation in order that trade in specimens of certain species referred to in the above paragraph may be brought to effective control.
Appendix III includes all species which any Party identifies as being subject to regulation within its jurisdiction for the purpose of preventing or restricting exploitation, and as needing the co-operation of other Parties in the control of trade.

The relevant parties shall not allow trade in specimens of species included in Appendices I, II, and III, except in accordance with the provisions of the present Convention.

**Appendix 3 – Further Description of The IUCN Red List of Threatened Species™**

The International Union for Conservation of Nature and Natural Resources (IUCN) is a membership Union composed of both private, public and non-governmental organizations. The IUCN Red List is a comprehensive and global list that assesses the conversation status of plant and animal species. The IUCN Red List of Threatened Species™ is known for its scientific rigor and approach for determining risks of extinction for global species and as a result has become the global standard. The IUCN Red List Categories and Criteria are used to determine the relative risk of extinction and the below diagram outlines the categorization of those levels of concern.

![IUCN Red List Categories and Criteria](image-url)
Appendix 4 – Further Description of The Endangered Species Act
The Endangered Species Act (ESA) was signed on December 28, 1973 and provides for the conversation of threatened and endangered plant and animal species and the conservation of the ecosystems on which they depend. The U.S. Fish and Wildlife Service maintains a global list of endangered species that includes birds, insects, fish, reptiles, mammals, crustaceans, flowers, grasses and trees. The law requires federal agencies, in consultation with the U.S. Fish and Wildlife Services and/or National Oceanic and Atmospheric Administration Fisheries Service, to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of designated critical habitat of such species. The law also prohibits any action that causes a “taking of any listed species of endangered fish or wildlife. Likewise, import, export interstate, and foreign commerce of listed species is generally prohibited.