



## ANIMAL WELFARE POLICY

### INTRODUCTION

At Clarks, everything we do is built on our strong ethical heritage and the way we do business is underpinned by a strong sense of our responsibilities as a global footwear brand.

The Clarks Code of Business Ethics sets out the ethical principles we expect all employees to demonstrate to ensure that the highest standards are maintained. These include:

“We operate with integrity and honesty”

“We are committed to making social and environmental responsibilities a key part of how we make decisions”.

As part of this, Clarks places a high priority on animal welfare within our product supply chains. We have a zero-tolerance approach to the mistreatment and abuse of animals and request that all Clarks suppliers accept and follow the requirements set out in this policy and produce due diligence down their supply chain.

### PURPOSE

Clarks Responsible Sourcing Policy for Animal Derived Materials ensures that Clarks suppliers understand the:

- seriousness and importance that Clarks places on animal welfare in our product supply chain;
- expectation that suppliers will take steps to promote good animal welfare (the Five Freedoms) within their supply chains;
- promote to source from farmers and suppliers with good animal husbandry practices.
- species, animal welfare and information requirements which apply to the supply of animal skins and wool used in Clarks products;
- procedures for demonstrating compliance to the policy.

Suppliers are expected to sign a declaration of conformity each year to confirm that they have received and will comply with the requirements set out in this policy.

### POLICY

Clarks supports the humane treatment of animals in our materials supply chain. The following requirements must be applied to animal-derived materials used in our products. Clarks will not knowingly source materials which are not in compliance with this policy. The requirements stipulated in this policy, are effective immediately unless specifically stated.

#### All Animal Derived Materials

- Clarks does not accept any animal derived materials from:
- Endangered wild species as defined by:
  - The International Union for Conservation of Nature and Natural Resources (IUCN) – red list categories critically endangered, endangered, vulnerable or near threatened. This does not include species categorised as ‘least concern’. [www.redlist.org](http://www.redlist.org)
  - The Convention on International Trade in Endangered Species (CITES) [www.cites.org](http://www.cites.org)
  - The U.S. Endangered Species Act
  - Where applicable skins to be accompanied by relevant CITES or export documentation to demonstrate compliance.
- Species banned by the US State of California Penal Code section 653o(a)

#### Leather

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- Clarks will only accept leather that is a by-product of food production and from domesticated animals such as cow, buffalo, sheep and goat.
- Clarks does not accept any leather material from:
  - Pig leather.
  - Exotic skins including but not limited to; snake, alligator, crocodile, lizard, ostrich or kangaroo.
  - Animals killed as part of game hunts or population culls this includes Deer, Elk and Kudu.
  - Domestic animals including but not limited to; Cat, fish, frogs, rabbit, or dog species.
  - Astrakhan, Karakul, Abroadtail, Krimmer, Persian lamb, Slink or Swakara or any other animals which are the result of unnatural abortions.
  - Skins produced as a result of live boiling or live skinning.

### Country of Origin for Leather

- When disclosing tanneries supplier list to Clarks, suppliers must declare the country in which the animals were slaughtered.
- Due to animal welfare concerns cow hides must not be from animals reared or slaughtered in India and Bangladesh.
- Due to effluent treatment practice concerns no leather should be sourced from tanneries operating in Bangladesh.

### Wool, Sheepskin and Sheep Shearling

Clarks supports industry initiatives that seeks to improve animal welfare practices. One such initiative is the Responsible Wool Standard (RWS), which aims to recognise suppliers which are implementing the five freedoms of animal welfare as well as supporting farmers to continuously improve their land management techniques. We ask that our suppliers consider sourcing RWS wool and to communicate this to Clarks.

### Species and live plucking

Clarks products must not use live plucking process or be derived from:

- Angora wool derived from the angora rabbit.
- Mongolian lambs fur- due to the traditional method of slaughter.

### Mulesing

All Clarks materials containing wool, must not be sourced from sheep that have undergone mulesing.

### Country of Origin for Wool

Suppliers must declare the country in which the animals were slaughtered or sheared (as appropriate), and update Clarks should this country of origin change. As part of Clarks due diligence process we may request additional documentation to demonstrate country of origin of wool, Clarks expects that all suppliers have this information readily available.

### All Animal Derived Materials

Clarks recognises that tier 1 suppliers do not always have influence or traceability of animal derived materials down to individual farm level. However, Clarks expects all suppliers of animal derived materials to take steps to promote good animal welfare based on the Five Freedoms (see Definitions) within their supply chains.

## POLICY SCOPE

Clarks suppliers are responsible for ensuring that the requirements within the Responsible Sourcing Policy for Animal Derived Materials are complied with. This also requires that they ensure that they are satisfied that their suppliers and their supply chain also meet these requirements.

### Compliance



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Clarks suppliers must have documented evidence in place to demonstrate compliance to this policy and to conduct routine checks with their suppliers (e.g., of materials) on a seasonal basis.

If Clarks determines that a material does not conform to the terms of this policy, the non-compliant party agrees to:

- Begin an investigation into the cause and extent of the non-conformity;
- Undertake corrective action, as approved by Clarks;
- Clarks will take any steps required to ensure that the corrective action has successfully addressed the non-conformity;
- Clarks reserves the right to cease the use of the non-compliant material and charge any costs as a result of a non-compliant materials back to the supplier of that material; and
- Corrective action will be taken if any breaches are brought to our attention. For materials that are found to be non-compliant, Clarks reserves the right have material returned to suppliers at the suppliers cost and terminate our relationship with that supplier.

## DEFINITIONS

### **Term: Supplier**

“Supplier” includes but is not limited to vendors, agents, licensees, factories and sub-contractors.

### **Term: The Five Freedoms of Animal Welfare**

**Definition:** An internationally recognised set of guiding principles on animal welfare, as follows:

1. Freedom from hunger and thirst – by ready access to fresh water and a diet to maintain full health and vigour;
2. Freedom from discomfort – by providing an appropriate environment including shelter and a comfortable resting area;
3. Freedom from pain, injury and disease – by prevention or rapid diagnosis and treatment;
4. Freedom to express normal behaviour – by providing sufficient space, proper facilities and company of the animal’s own kind; and
5. Freedom from fear and distress – by ensuring conditions and treatment which avoid mental suffering.

### **Term: The International Union for Conservation of Nature and Natural Resources (IUCN) – red list categories**

**Definition:** A widely recognised global approach to evaluate the conservation status of species. The red list categories are critically endangered, endangered, vulnerable or near threatened. This does not include species categorised as ‘least concern’. [www.redlist.org](http://www.redlist.org)

### **Term: The Convention on International Trade in Endangered Species (CITES)**

**Definition:** CITES is an international agreement between governments, which works to ensure protect endangered animals and plants.

### **Term: The U.S. Endangered Species Act**

**Definition:** Signed in 1973, the Act was developed to conserve species that are endangered or threatened.

### **Term: US State of California Penal Code section 653o(a)**

**Definition:** California’s Penal Code forms the basis of criminal law in the American state of California. Section 6530 (a), stipulates bans on the import into the state for commercial purposes, to possess with intent to sell or sell within the state, the dead body, or any part or product thereof of a polar bear, leopard, ocelot, tiger, cheetah, jaguar, sable antelope, wolf (canis lupus), zebra, whale, cobra, python, sea turtle, colobus monkey, kangaroo, vicuna, sea otter, free-roaming feral horse, dolphin or porpoise (Delphinidae), Spanish lynx, or elephant.

### **Term: Responsible Wool Standard (RWS)**

**Definition:** An independent standard and certification scheme which certifies use of wool within a final product from farms which implement the five freedoms of animal welfare. In addition, the standard promotes responsible land management techniques. Through the processing stages, certification ensures that wool from certified farms is properly identified and tracked.



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**Term: Mulesing**

**Definition:** The removal of strips of skin from around the breech and tail of a sheep to prevent flystrike.

**Term: Karakul**

**Definition:** Whereby the karakul sheep is killed whilst pregnant and the lamb is removed, it is also called, astrakhan or Persian lamb.

### RELATED POLICIES

Code of Business Ethics

Code of Practice

### SUPPORTING INFORMATION

<http://www.iucnredlist.org/technical-documents/categories-and-criteria>

<https://cites.org/>

<https://www.fws.gov/endangered/laws-policies/>

<http://law.justia.com/codes/california/2014/code-pen/part-1/title-15/chapter-2/section-6530>

<http://responsiblewool.org>

<http://www.ibama.gov.br/>