

Sustainable Sourcing Policy

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1 Purpose and Area of Application

All companies of the Zalando Group are committed to trading responsibly and we take steps to ensure that the goods we sell and procure have been produced in an ethical, safe and environmentally conscious manner. Our [do.MORE strategy](#) is to be a sustainable fashion platform with a net-positive impact for people and the planet, and we have set bold, measurable targets until 2023 which cover all areas of our business.

Our Sustainable Sourcing Policy is complementary to our [Code of Conduct and other sustainability and ethical standards](#), which set the baseline for social, environmental and chemical compliance, and applies to all business partners, including, but not limited to: suppliers, agents and trading companies (hereinafter “Business Partners”) of Zalando SE and all its subsidiaries (hereinafter “Zalando”). It aims to support the transition to a fair, sustainable and circular economy and defines minimum requirements for the use of specific fibers, materials and manufacturing methods for products sold through Zalando, as well as our strategy for implementation and how we will measure and publicly report our progress. It will be reviewed on a regular basis to incorporate updates.

We have adopted a continuous improvement approach towards our 2023 ambitions, which we expect Business Partners to adopt and demonstrate clear progress against. This improvement reflects our ambition to raise the bar across the industry and only work with partners who align with our ethical standards by 2023. In addition to ongoing compliance checks carried out during delivery and production, Zalando will perform regular spot-checks on the product assortment to verify Business Partners’ compliance with this policy and the minimum requirements per material category as specified below. Business Partners must provide all relevant information on request and products that are considered to be in violation of this policy will be removed from sale. Further, Zalando reserves the right to suspend partners from selling on the platform or terminate the business relationship, if they violate these guidelines and the legal requirements for such termination under applicable law are met.

2 Summary of Standards

The following table summarizes the minimum standards to which Business Partners selling through Zalando must adhere and provides clear guidance on progress towards expected sustainability performance by 2023.

Topic	Minimum Requirements	2023 Ambition
Manufacturing Processes	<ul style="list-style-type: none"> All products must comply with EU REACH regulations and all applicable standards set by international markets. Business Partners must comply with Zalando's Restricted Substances List and aim to reduce environmental impacts wherever possible. The use of sandblasting is not permitted. 	<ul style="list-style-type: none"> Business Partners should demonstrate progress towards eliminating discharge of hazardous chemicals within the supply chain. Business Partners should demonstrate progress towards increasing adoption of the Higg FEM in their supply chain.
Cotton Fibers	<ul style="list-style-type: none"> Sourcing cotton from countries at high risk of forced labor issues is not permitted (including, but not limited to: Uzbekistan, Turkmenistan, or the Xinjiang region of China). 	<ul style="list-style-type: none"> Business Partners should set public commitments for sourcing more sustainable cotton. At least 50% of cotton (by volume) should be sustainably-sourced, via participation in globally recognized certification programmes as defined by the CottonUP Guide or TE's Sustainable Cotton Matrix.
Synthetic Fibers	<ul style="list-style-type: none"> Business Partners should aim to increase the amount of renewable or recycled material wherever possible. 	<ul style="list-style-type: none"> Business Partners should set public targets for sourcing renewable or recycled synthetic fibers.
Forest Fibers and Materials	<ul style="list-style-type: none"> Business Partners must demonstrate progress towards eliminating man-made cellulosic fiber (MMCF) suppliers with a high risk of sourcing wood pulp from ancient and endangered forests (see Hot Button Report). The sale of products made from species listed on IUCN and CITES (e.g. certain wood types) is not permitted. 	<ul style="list-style-type: none"> 100% of MMCFs should be sourced from low-risk suppliers (green shirt >20 points in Hot Button Report). 100% certified, recycled or otherwise sustainably-sourced wood, paper, cork and rubber (e.g. FSC, PEFC, RCS, GRS, etc).
Animal-Derived Materials	<ul style="list-style-type: none"> Business Partners must adhere to the principles set out in our Animal Welfare Policy. Animal-derived materials may only be sourced from domesticated farmed species as a by-product of farming for food production. Materials from wild animals are not permitted, e.g. which appear on the IUCN or CITES checklists. Fur is not permitted, regardless of source. Business Partners must develop robust traceability systems and provide species name (common and Latin) and country of origin on request. Business Partners should refer to the guidelines below for information on specific materials. 	<ul style="list-style-type: none"> Business Partners should set public commitments for sourcing more sustainable leather. At least 50% of leather (by volume) should come from more sustainable sources (e.g. from LWVG tanneries or an equivalent standard). Business Partners demonstrate progress towards leather traceability back to the slaughterhouse. Business Partners should ensure full traceability across wool and hair products and demonstrate year-on-year increases in certified, organic or recycled materials. 100% certified, recycled or otherwise sustainably sourced feathers and down.
Plastic	<ul style="list-style-type: none"> Business Partners should aim to increase the amount of recyclable, renewable or recycled plastic used in products wherever possible. 	<ul style="list-style-type: none"> Business Partners should set public targets for sourcing recyclable, renewable or recycled plastic in products. Polyvinyl chloride (PVC) must be replaced in all products for which alternatives are possible, e.g. polyurethane.
Metal and Fine Jewelry	<ul style="list-style-type: none"> Business Partners selling precious metals and stones must have a responsible mineral supply chain policy. Business Partners selling precious metals and stones must demonstrate progress towards sustainable sourcing (e.g. Responsible Jewellery Council). 	<ul style="list-style-type: none"> Business Partners selling precious metals and stones should set public targets for sourcing recycled or sustainably-sourced materials (e.g. Fairmined, RJC). Business Partners should demonstrate traceability of all key raw materials used in metal / jewelry products. Business Partners selling diamonds should comply with the Kimberley Process Certification Scheme and the World Diamond Council's System of Warranties.
Electronics	<ul style="list-style-type: none"> All electronic products must comply with RoHS and WEEE directives. Business Partners selling electronics must have a responsible mineral supply chain policy addressing social and environmental risks (e.g. conflict regions). 	<ul style="list-style-type: none"> Business Partners should set public targets for sourcing recycled or sustainably-sourced materials. Business Partners should demonstrate traceability of all key raw materials used in electronic products, e.g. tin, tungsten, tantalum, gold, cobalt.
Beauty	<ul style="list-style-type: none"> All beauty products must comply with Regulation (EC) 1223/2009. No beauty products may be tested on animals. The use of solid microplastics (>5mm) is not permitted. The use of bee venom, snake venom and coral extract is not permitted. Business Partners must demonstrate mitigation of the human rights risks of mica sourcing. 	<ul style="list-style-type: none"> Business Partners should set public targets for sustainably-sourced ingredients.

3 Minimum Sourcing Requirements and 2023 Ambition

3.1 Manufacturing Processes

Chemical Management

Zalando's **Restricted Substances List (RSL)** specifies the chemical limits permitted in our products in line with EU REACH regulations and all applicable standards set by international markets. All Business Partners are required to implement a robust chemical management system and due diligence testing to ensure compliance with Zalando's RSL. We carry out additional tests across our product range to ensure our products are safe for customers and regularly update our RSL. Zalando is committed to driving positive improvements through close collaboration with our Business Partners.

Wet Processing

Wet processes such as dyeing, finishing and leather tanning use substantial amounts of water and involve large quantities of dyes and chemicals, which can leave behind polluting residues. Zalando is committed to lowering the environmental impact of our Private Labels production and encouraging our Business Partners to do the same.

Sandblasting

Sandblasting involves projecting fine sand with compressed air to create a worn look on denim and other apparel products. Sandblasting can be extremely damaging to the health of workers and can lead to a potentially fatal lung disease called silicosis. Zalando recognises the risks to workers and the environment and has banned the use of sandblasting within our supply chain.

Minimum Requirements	2023 Ambition
<ul style="list-style-type: none"> Business Partners must comply with Zalando's Code of Conduct and aim to reduce environmental impacts wherever possible. Business Partners must comply with Zalando's RSL and implement a robust chemical management system and due diligence testing. The use of sandblasting is not permitted. The following alternative processes may be used: washing; stone-washing; chemical treatments; lazer/ozone treatments; hand sanding/manual treatments using sandpaper; or machine sanding. 	<ul style="list-style-type: none"> Business Partners should be able to demonstrate progress towards eliminating discharge of hazardous chemicals within the supply chain, either through industry initiatives (e.g. ZDHC, bluesign®, Higg FEM) or internal MRSL programs. Business Partners should be able to demonstrate progress towards increasing adoption of the Higg Facility Environmental Module in their supply chain. We encourage the use of lower impact processing methods and participation in industry initiatives (e.g. Clean By Design).

3.2 Cotton Fibers

Cotton is a traditionally resource-intensive crop which requires large amounts of water and pesticides to grow. In certain regions, there are also human rights risks related to forced labor. Zalando is committed to scaling the sourcing of more sustainable cotton in the industry and eradicating risks of forced labor from its supply chain. As clearly outlined in our Code of Conduct, Zalando does not permit the use of forced labor, child labor or any other form of modern slavery and therefore sourcing cotton from countries at high risk of forced labor issues is not permitted.

Minimum Requirements	2023 Ambition
<ul style="list-style-type: none"> Sourcing cotton from countries at high risk of forced labor issues is not permitted (including, but not limited to: Uzbekistan, Turkmenistan, or the Xinjiang region of China). 	<ul style="list-style-type: none"> Business Partners should set public targets for sourcing more sustainable cotton. At least 50% cotton (by volume) should be sustainably-sourced, via participation in globally recognized certification programmes as defined by the CottonUP Guide and Textile Exchange's Sustainable Cotton Matrix.

3.3 Synthetic Fibers

Synthetic fibers such as polyester and nylon are traditionally made from non-renewable fossil fuels and require significant amounts of energy to be manufactured into fabric. Washing synthetic fibers also contributes to microplastic pollution of waterways and oceans.¹ Zalando is committed to increasing the use of renewable or recycled feedstocks in synthetic fiber production, and working collaboratively with the industry to develop solutions for microplastics.

Minimum Requirements	2023 Ambition
<ul style="list-style-type: none"> Business Partners should aim to increase the amount of renewable or recycled material used in products wherever possible. 	<ul style="list-style-type: none"> Business Partners should set public targets for sourcing renewable or recycled synthetic fibers (see Textile Exchange's resources). We encourage participation in industry groups related to bio-based synthetics and microplastic pollution.

¹ For more information and resources, see <https://www.microfibreconsortium.com/>.

3.4 Forest Fibers and Materials

Man-Made Cellulosic Fibers (MMCFs)

Man-made cellulosic textile fibers such as viscose/rayon, modal and lyocell are made from wood pulp, which is then turned into a semi-synthetic fiber in a chemical process. Zalando is committed to protecting the world’s forests and reducing the environmental impact of chemical processing on waterways, air emissions and local communities. As set out in our [Cellulosic Fabric Standard](#), we are working towards eliminating the sourcing of wood pulp from ancient and endangered forests² across our private label supply chain together with the non-for-profit organization Canopy.

Minimum Requirements	2023 Ambition
<ul style="list-style-type: none"> Business Partners must demonstrate progress towards eliminating suppliers with a high risk of sourcing wood pulp from ancient and endangered forests, using tools such as Canopy’s Hot Button Report. 	<ul style="list-style-type: none"> 100% low risk of sourcing from ancient and endangered forests, based on Canopy’s Hot Button Report. We encourage sourcing of circular and lower environmental impact fibers and processing techniques (e.g. EU BAT, closed-loop technology, agricultural residues and recycled content).

² According to non-profit organization Canopy, ancient and endangered forests are defined as intact forest landscape mosaics, naturally rare forest types, forest types that have been made rare due to human activity, and/or other forests that are ecologically critical for the protection of biological diversity. Ecological components of endangered forests are: Intact forest landscapes; Remnant forests and restoration cores; Landscape connectivity; Rare forest types; Forests of high species richness; Forests containing high concentrations of rare and endangered species; Forests of high endemism; Core habitat for focal species; Forests exhibiting rare ecological and evolutionary phenomena. As a starting point to geographically locate ancient and endangered forests, maps of High Conservation Value Forests (HCVF), as defined by the Forest Stewardship Council (FSC), and of intact forest landscapes (IFL), can be used and paired with maps of other key ecological values like the habitat range of key endangered species and forests containing high concentrations of terrestrial carbon and High Carbon Stocks (HCS). (The Wye River Coalition’s Endangered Forests: High Conservation Value Forests Protection – Guidance for Corporate Commitments. This has been reviewed by conservation groups, corporations, and scientists such as Dr. Jim Stritholt, President and Executive Director of the Conservation Biology Institute, and has been adopted by corporations for their forest sourcing policies).

Wood, Paper, Cork and Rubber

Zalando is committed to protecting the world's forests as a critical lever to regenerate ecosystems, promote biodiversity, and protect the rights of indigenous rural communities. Zalando does not permit the sale of products which contain materials from vulnerable or endangered species, and encourages responsible forestry practices as well as the increased use of recycled content.

Minimum Requirements	2023 Ambition
<ul style="list-style-type: none">• Zalando expressly forbids the sale of vulnerable or endangered species, which appear on either the International Union for the Conservation of Nature (IUCN) or the Convention of International Trade in Endangered Species (CITES) checklists.• On request, Business Partners must provide key sourcing information including the species name (common and Latin) and country of origin.• Zalando encourages Business Partners to ensure all forest-derived materials come from certified (e.g. FSC, PEFC), recycled or otherwise sustainable sources.	<ul style="list-style-type: none">• 100% certified, recycled or otherwise sustainably sourced materials (e.g. FSC, PEFC, RCS, GRS).• We encourage participation in supply chain projects related to regeneration of ecosystems, biodiversity and community engagement.

3.5 Animal-Derived Materials

Zalando is committed to good animal welfare and the conservation of biodiversity, and we recognize the responsibility we share with the fashion industry to guarantee good animal welfare when sourcing animal-derived materials within supply chains. Our [Animal Welfare Policy](#) sets out the seven Principles to which Business Partners must adhere when supplying products made from animal-derived materials, for example: materials may only be sourced from domesticated farmed species as a by-product of farming for food production; materials from wild animals (including those on the [IUCN](#) or [CITES](#) checklists) are not permitted; and fur is not permitted, regardless of source. More detailed standards and specific guidelines per material type can be found below.

Leather & Animal Skin

Leather is a durable and long-lasting material that is usually a by-product of farming for food production. However, unsustainable meat production contributes to global deforestation and leather processing involves many complex chemical reactions³ with significant human health and environmental risks. Zalando is committed to collaborating with the industry towards greater traceability in the leather supply chain to improve animal welfare standards and reduce the risks of deforestation. We are also committed to supporting responsible leather production through regenerative farming practices, sustainable manufacturing methods and circular business models which keep products in use and protect artisan skills.

³ [Best Available Techniques \(BAT\) Reference Document for the Tanning of Hides and Skins](#), EU Commission, 2010.

Minimum Requirements	2023 Ambition
<ul style="list-style-type: none"> • Only leather or skin from domesticated animals sourced as a by-product of farming for food production may be used in products sold through Zalando. This includes, but is not limited to: cow, buffalo, goat, lamb, pig, sheep and yak. • Leather or skin from wild animals is not permitted. Zalando expressly prohibits products made from alligator, crocodile, lizard, marine mammals, ostrich, kangaroo, and snake. • Leather or skin from live, newborn or aborted animals (e.g. slink or karakul) is not permitted. • Leather from companion animals including dogs and cats is not permitted. 	<ul style="list-style-type: none"> • Business Partners should set public targets for sourcing more sustainable leather covering the environmental, social and animal welfare impacts of leather production. • At least 50% of leather (by volume) should come from more sustainable sources. Business Partners should provide transparency on the tanneries used to source leather, including those audited to the Leather Working Group (LWG) protocol or equivalent standard. • Business Partners should demonstrate progress towards creating traceability in the supply chain back to the slaughterhouse, monitored through the LWG Traceability Score or other platforms such as the ICEC, Responsible Leather Initiative or the Brazilian Leather Project. • We encourage participation in industry working groups such as the Leather Impact Accelerator and LWG Traceability Working Group.

Wool & Animal Hair

Wool and other types of animal hair are natural and durable materials with insulating qualities. However, poor animal husbandry and intensive farming practices can lead to animal welfare abuses and negative environmental impacts. Zalando is committed to leading by example and became certified to the Responsible Wool Standard in 2020, which ensures that sheep have been treated responsibly and come from farms with a progressive approach to land management. We commit to increasing the amount of certified wool sourced for our Private Label products on an annual basis.

Minimum Requirements	2023 Ambition
<ul style="list-style-type: none"> • Only wool and animal hair from domesticated animals sourced as a by-product of farming for food production may be used in products sold through Zalando. This includes, but is not limited to: cow, buffalo, goat, lamb, pig, sheep, camel, alpaca and yak. • Wool and animal hair from wild animals is not permitted. • Wool from newborn or aborted animals (e.g. karakul) is not permitted. • Wool and animal hair from companion animals including dogs and cats is not permitted. • Wool from animals on which mulesing is performed is not permitted. • Hair from rabbit (angora) and badger is not permitted. • Mohair is only permitted if the product and Business Partner are both certified to the Responsible Mohair Standard. 	<ul style="list-style-type: none"> • Business Partners should ensure full supply chain traceability across all wool and hair products to identify country of origin and farming systems in place. The method of wool or hair harvesting (combing, manual or machine shearing, etc) should be identified with the aim to establish best practice. • Business Partners should demonstrate progress towards sourcing certified, organic, recycled or otherwise sustainably-sourced animal wool and hair (e.g. through the Responsible Wool Standard, the Responsible Mohair Standard, the Good Cashmere Standard, or equivalent), and increase this percentage on an annual basis. • We encourage participation in industry working groups and round tables.

Feathers & Down

Feathers and down are natural materials with insulating qualities often used in outerwear, sports performance products, or for decorative purposes. There are significant risks of

animal welfare abuses in the harvesting of bird feathers, including live plucking. Zalando is committed to ensuring that all animals are treated humanely and encourages the use of recycled and renewable alternative materials. Zalando became certified to the Responsible Down Standard in 2018. 100% of the down in our Private Label products comes from RDS certified sources, which ensures that animals that have been treated humanely.

Minimum Requirements	2023 Ambition
<ul style="list-style-type: none"> • Only feathers or down from domesticated animals sourced as a by-product of farming for food production may be used in products sold through Zalando. This includes, but is not limited to: duck and goose. • Feathers or down obtained from wild birds are not permitted. This includes, but is not limited to: ostrich, peacock or maribou feathers. • Feathers or down obtained through live-plucking are not permitted. • Feathers as a by-product of fowl raised to produce foie-gras (e.g. force-feeding) are not permitted. 	<ul style="list-style-type: none"> • 100% of feathers and down should be certified, recycled or otherwise sustainably sourced (e.g. through the Responsible Down Standard, the Global Traceable Down Standard, or Downpass). • We encourage participation in industry working groups and round tables.

Bone, Horn, Shell, Coral & Teeth

Bone, horn, shell, coral and teeth are natural materials used for jewellery, trimmings or decorative purposes. There are both environmental and animal welfare issues linked to the collection and production of these materials. Zalando is committed to responsible sourcing of such materials, and does not permit the sale of products which contain materials from vulnerable or endangered species.

Minimum Requirements	2023 Ambition
<ul style="list-style-type: none"> • Only bone, horn, shell, and teeth from domesticated animals sourced as a by-product of farming for food production may be used in products sold through Zalando. This includes, but is not limited to: cow, buffalo, goat, lamb, pig, sheep, camel, alpaca or yak. • Bone, horn, shell and teeth from wild animals are not permitted. • Zalando expressly prohibits products made from freshwater pearls, mussel and coral. 	<ul style="list-style-type: none"> • We encourage participation in industry working groups and round tables.

3.6 Plastics

Plastic⁴ is a robust yet lightweight material commonly made from non-renewable fossil fuels, which usually does not biodegrade at the end of its life and contributes to pollution of the land and sea. Zalando is committed to increasing the use of recyclable, renewable or recycled plastic in the products we sell. We also commit to eliminating single-use plastics from our packaging by 2023.

Minimum Requirements	2023 Ambition
<ul style="list-style-type: none"> Business Partners should aim to increase the amount of recyclable, renewable or recycled plastic used in products wherever possible. 	<ul style="list-style-type: none"> Business Partners should set public targets for sourcing recyclable, renewable or recycled plastic in their products. Polyvinyl chloride (PVC) must be replaced in all products for which it is possible to use alternative materials, e.g. polyurethane (PU). We encourage participation in industry groups related to bio-based plastics and microplastic pollution.

3.7 Metals and Fine Jewelry

The mining and processing of metals and semi-precious/precious stones pose severe social and environmental risks⁵, including child labor, forced labor and human trafficking, violation of indigenous peoples’ rights, armed conflict violations, pollution of water and air, soil degradation and deforestation. Zalando is committed to addressing these risks through collaborative action towards improved traceability in the industry, and encourages the increased use of recycled or sustainably-sourced materials to support the circular economy and artisan skills.

Minimum Requirements	2023 Ambition
<ul style="list-style-type: none"> All jewelry products must meet EU REACH regulations and all applicable standards set by international markets regarding chemical compliance. Business Partners selling precious metals and stones through Zalando must have a responsible mineral supply chain policy addressing social and environmental risks (e.g. diamond sourcing from conflict regions). Business Partners selling precious metals and stones through Zalando must be able to demonstrate progress towards sustainable sourcing (e.g. through the Responsible Jewellery Council or equivalent). 	<ul style="list-style-type: none"> Business Partners selling precious metals and stones should set public targets for sourcing recycled or sustainably-sourced materials (e.g. Fairmined and/or fair trade schemes, RJC chain of custody, sourcing from certified mines). Business Partners should be able to demonstrate traceability of all key raw materials used in metal / jewelry products. Business Partners selling diamonds should comply with the Kimberley Process Certification Scheme and the World Diamond Council's System of Warranties.

⁴ According to [Directive \(EU\) 2019/904](#), ‘plastic’ means a material consisting of a polymer, to which additives or other substances may have been added, and which can function as a main structural component of final products, with the exception of natural polymers that have not been chemically modified.

⁵ [Responsible mining? Challenges, perspectives and approaches](#) (German Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety, 2017)

3.8 Electronics

Electronics are complex devices comprising hundreds of components made from different metals and chemical elements and compounds. There are severe social and environmental risks related to the mining and processing of these materials, specifically from conflict regions, and the waste generated from discarded electronics is a growing problem in the industry. Zalando is committed to addressing these risks through collaborative action towards improved traceability in the industry, and encourages the increased use of recycled or sustainably-sourced materials to support the circular economy and reduce the amount of electronic waste generated.

Minimum Requirements	2023 Ambition
<ul style="list-style-type: none"> All electronic products must comply with RoHS and WEEE directives on electrical and electronic equipment. Business Partners selling electronics through Zalando must have a responsible mineral supply chain policy addressing social and environmental risks (e.g. sourcing of materials from conflict regions). 	<ul style="list-style-type: none"> Business Partners should set public targets for sourcing recycled or sustainably-sourced materials. Business Partners should be able to demonstrate traceability of all key raw materials used in electronic products, e.g. tin, tungsten, tantalum, gold, cobalt. We encourage preferential sourcing of renewable and recyclable materials to support the transition to a circular system; e.g. aluminium, borosilicate glass, graphene.

3.9 Beauty

There are various social, environmental and animal welfare risks related to the ingredient sourcing, manufacture, packaging and disposal of beauty products. Zalando is committed to addressing these issues and providing a platform to offer more sustainable and circular beauty products to customers. As specified in our [Animal Welfare Policy](#), no cosmetic/beauty products sold on Zalando may be tested on animals, in accordance with EU legislation⁶, and we do not permit the use of certain animal-derived ingredients in the cosmetics we sell. Zalando is also committed to addressing the human rights risks of mica⁷ sourcing through the use of synthetic mica alternatives or robust traceability programs, whereby working conditions can be closely monitored.

Minimum Requirements	2023 Ambition
<ul style="list-style-type: none"> • All beauty products must comply with Regulation (EC) 1223/2009 on cosmetic products. • No beauty products may be tested on animals. • The use of bee venom, snake venom and coral extract in beauty products is not permitted. • The use of solid microplastics (>5mm) in beauty products is not permitted, in line with European legislation (e.g. UK, Sweden). • Business Partners must be able to demonstrate mitigation of the human rights risks of mica sourcing, either through the use of synthetic alternatives or robust traceability programs. 	<ul style="list-style-type: none"> • Business Partners should set public targets for sustainably-sourced ingredients. • We encourage participation in industry groups related to sustainable sourcing (e.g. the Responsible Mica Initiative).

⁶ See https://ec.europa.eu/growth/sectors/cosmetics/animal-testing_en.

⁷ See [Global mica mining and the impact on children's rights](#), (Somo, 2018).