



Pollution Prevention Policy

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Policy owner:	Head of Sustainability, Sofia Skrypnyk, sustainability@canda.com
Effective date:	1 Juni 2026
Scope:	Global (all countries)
Short description:	This Policy defines C&A's commitment to prevent, reduce and control pollution across its operations and supply chain, in alignment with CSRD and ESRS requirements.
Related policies:	Code of Conduct and Supporting Guidelines to the Code of Conduct, Circularity Policy

1. Scope

This policy applies to all employees, directors and the management of C&A group of companies. The Policy also applies globally to the consolidated activities of C&A Europe and to suppliers, contractors, logistics providers and business partners involved in the manufacturing, processing, finishing, storage, transport or handling of C&A products.

Textile and apparel supply chains are associated with pollution risks and impacts affecting water, air, and soil. These risks arise mainly from manufacturing and material processing activities, including dyeing, printing, washing, finishing, coating, surface treatment, and chemical handling, as well as from storage, wastewater treatment, air emission control, sludge management, waste handling, and transport.

C&A recognizes pollution as a material environmental impact and risk within its value chain and is committed to preventing, reducing and controlling pollution linked to its products, business activities and supply chain relationships.

This policy supports compliance with applicable environmental legislation and reporting requirements, including the European Corporate Sustainability Reporting Directive and the European Sustainability Reporting Standard on Pollution.

The policy defines C&A's approach to pollution prevention and control across five areas:

- Chemical management, including hazardous substances, substances of concern and per- and polyfluoroalkyl substances
- Microfiber and microplastic pollution
- Textile and garment waste generated during production
- Wastewater, air emissions, sludge and other process-related waste
- Pollution risks linked to logistics and distribution activities¹.

The objectives of this policy are to prevent and reduce pollution, support compliance with applicable environmental legislation and recognized industry standards and strengthen environmental management practices across C&A's value chain.

2. Principles

2.1. Strategic Principles

C&A's pollution prevention approach is guided by applicable environmental legislation and recognized industry frameworks, including the European Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals (REACH Regulation), the Zero Discharge of Hazardous Chemicals Manufacturing Restricted Substances List (ZDHC MRSL) and Wastewater Guidelines, and the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector.

¹ Material choices and product circularity are out of scope of this Policy, even where they influence pollution impacts. These are addressed through C&A's Circularity Policy and will be further governed through a dedicated materials policy.

Due diligence and risk-based management

C&A undertakes pollution-related due diligence to identify and address pollution-related adverse impacts associated with its activities and business relationships and, where appropriate, support remediation.

This approach is implemented in a risk-based manner, taking into account C&A's leverage within the value chain and supported by environmental requirements, monitoring and review mechanisms, and periodic updates reflecting regulatory, scientific and industry developments.

Suppliers and business partners are expected to identify and manage pollution risks linked to their activities and to implement measures proportionate to the nature and scale of those risks, including by cascading pollution-prevention expectations within their own supply chains where appropriate.

Prevention hierarchy

To guide decision-making once pollution risks are identified, C&A prioritizes pollution prevention at source. Where prevention is not fully possible, measures must be applied in the following order:

1. reduction of pollution risks,
2. control of emissions and releases,
3. responsible management of unavoidable waste and discharge streams, and
4. remediation of pollution-related impacts where required.

Compliance and accountability

Suppliers and business partners must comply with all applicable national environmental legislation and regulations, and adhere to internationally recognized standards, in addition to this Policy and C&A requirements.

They are expected to maintain appropriate environmental controls, records and documentation; cooperate with monitoring and audit activities; provide relevant information, records and facility access upon request; and address identified non-compliances and pollution impacts through timely corrective actions, remediation and verification of effectiveness to prevent recurrence.

Where local legal requirements are less stringent than C&A requirements or adopted international industry standards, the higher standard should be followed where legally permissible.

2.2. Pollution Prevention in Manufacturing

2.2.1 Responsible Chemical Inventory Management

C&A requires suppliers to manage chemicals responsibly across input, process and output stages, in line with C&A chemical management requirements and related supplier guidance documents, including the latest versions of the Apparel and Footwear International RSL Management Group's Restricted Substances List (AFIRM RSL) and ZDHC MRSL.

C&A pays particular attention to substance groups associated with elevated regulatory, environmental or human health concerns, taking into account product type, material composition and risk. These include substances frequently identified through Safety Gate notifications, such as

per- and polyfluoroalkyl substances, phthalates, bisphenols, nickel, heavy metals, and short- and medium-chain chlorinated paraffins.

Suppliers must:

- Maintain up-to-date chemical inventories, safety documentation and relevant records.
- Ensure chemicals are safely handled, stored, used, and disposed of, in line with applicable chemical and occupational health and safety requirements, including where relevant in accordance with the REACH Regulation.
- Ensure that chemical inputs introduced, used or otherwise present within facilities during the processing of raw materials, as well as during manufacturing, finishing, assembly and other operations, are controlled to prevent cross-contamination and comply with RSL and MRSL requirements for C&A production.
- Prioritize the substitution and, where applicable, phase-out of substances of concern through the adoption of safer alternatives. Where exposure risks are uncertain or not yet fully understood, favour alternatives with a lower hazard profile.
- Maintain sufficient visibility over chemical-relevant inputs and processes used by subcontractors in the supply chain, to the extent necessary to effectively manage chemical risks and comply with applicable requirements.

PFAS Due Diligence

Per- and polyfluoroalkyl substances (PFAS) are synthetic chemicals historically used among other, in textile production to provide water-, oil- and stain-repellent properties. While their use is not yet fully phased out in parts of the industry, they are highly persistent and may create risks for human health, ecosystems and manufacturing environments if not properly controlled.

C&A prohibits the intentional use of PFAS in products since many years and requires suppliers to implement appropriate measures to prevent PFAS contamination in C&A production, including unintentional presence or discharge during manufacturing.

C&A applies a due diligence framework with risk-based evaluations of production units, targeted monitoring, verification and testing where elevated PFAS risks are identified. This may include the assessment of production processes, product categories, water systems (incoming or recycled water), material inputs and other potential sources of contamination.

Suppliers must:

- Refrain from any intentional use of PFAS, in line with C&A's longstanding prohibition. PFAS-containing formulations must not be used in chemicals, auxiliaries, dyes, inks, coatings, finishing agents, cleaning agents or other inputs used for C&A production;
- Establish effective controls to prevent PFAS cross-contamination of C&A products and production processes, including from shared equipment, water systems, chemical storage, production lines or other non-C&A production activities. Where PFAS are used for other customers, the progressive adoption of dedicated production facilities is expected. Interim preventive controls, such as segregation of production lines or equipment, must be applied to avoid impacts on C&A production; and
- Cooperate with C&A in investigation and remediation in line with applicable requirements where PFAS contamination or non-compliance is identified.

2.2.2 Microfiber and Microplastic Pollution

Microfibers released from textiles during manufacturing, product use and end-of-life processes may contribute to environmental pollution. Synthetic microfibers are a source of microplastic pollution

affecting marine, freshwater and terrestrial ecosystems. Other forms of microplastic pollution may also arise from products, materials and manufacturing processes involving synthetic polymers or plastic particles.

C&A recognizes microfiber and microplastic pollution as an emerging environmental challenge, accompanied by evolving scientific understanding and regulatory attention.

Suppliers are expected to support efforts to reduce microfiber and microplastic pollution through wastewater management practices and filtration or capture measures, where risks are identified. These include washing, dyeing, finishing, brushing, fleece processing and other operations associated with elevated fiber-shedding or microplastic-release risks. Such measures should be applied in line with recognized industry guidance, such as the Microfiber Consortium Manufacturing Guidelines, Control of Fiber Fragments in Wastewater, and evolving priorities under the Ecodesign for Sustainable Products Regulation (ESPR) and relevant EU policy frameworks applicable to textiles and manufacturing activities.

2.2.3 Textile Production Waste

Textile waste is generated during apparel manufacturing, particularly in cutting, sewing and finishing processes. If not properly managed, production waste may contribute to pollution through landfill disposal, incineration, uncontrolled dumping or burning, with potential impacts on soil, air quality and resource use.

C&A supports improved textile waste management across supplier production units by setting expectations, monitoring reported waste data, collaborating with suppliers and external partners, strengthening circular design concepts that reduce waste generation at source, and exploring opportunities to support the use of recycled textile inputs where feasible.

Suppliers must:

- Understand the parts of their production set-up relevant to textile waste generation and implement waste management systems covering handling, storage, disposal and, where operationally practicable, source separation of textile waste by material stream, including cotton, synthetic fibers, trims, paper, plastics and metals.
- Direct separated textile waste to reuse, higher-value recycling or other recovery routes.
- Prohibit unauthorized dumping and uncontrolled burning of textile production waste, seeking continuous reduction towards elimination of landfill disposal to the maximum extent operationally feasible.
- Maintain documentation on waste streams, volumes, destinations and treatment methods.
- Report waste streams, volumes, destinations, treatment methods and progress in improving textile waste management through the Higg Facility Environmental Module or other C&A-designated reporting tools.

2.3 Wastewater, Air Emissions and Process Waste

Manufacturing activities may also generate pollution through wastewater discharges, air emissions, sludge and other process-related waste streams.

C&A sets expectations for supplier environmental management, monitors relevant supplier performance data and may require corrective actions where pollution risks or non-compliances are identified.

Suppliers must:

- Implement environmental management systems that identify, control and regularly review pollution risks related to wastewater, air emissions, sludge and process waste.
- Implement wastewater treatment and discharge controls designed to prevent untreated or uncontrolled releases and control pollutants such as chemical oxygen demand, heavy metals, hazardous substances and other relevant pollutants, in line with the latest version of ZDHC Wastewater Guideline.
- Manage air emissions from manufacturing processes, including boilers, drying, coating and finishing operations, through appropriate operational controls, maintenance and monitoring.
- Handle, segregate, label, store, transport and dispose of sludge, non-compliant products, hazardous substances and other hazardous or non-hazardous process waste in a manner that prevents secondary pollution of soil, water or air, including by preventing the mixing of incompatible or hazardous and non-hazardous waste streams, and by using appropriately authorized waste contractors where required.
- Conduct monitoring, testing and record-keeping for wastewater, air emissions and sludge appropriate to the pollution risks and activities of the facility.
- Maintain procedures for responding to pollution-related incidents, including spills, accidental releases and treatment failures, and implement corrective and preventive measures to reduce recurrence.

2.4 Pollution Prevention in Logistics and Distribution

Logistics and distribution activities may contribute to pollution through transport-related emissions, fuel use, warehouse operations and accidental releases.

C&A seeks to reduce pollution impacts from logistics and distribution by improving transport efficiency, reducing unnecessary transport movements and supporting lower-emission logistics solutions where feasible.

Logistics providers are expected to:

- Optimize transport routes, load utilization and distribution planning to reduce unnecessary fuel consumption and emissions.
- Support lower-emission transportation solutions, including alternative fuels, electrified transport or other lower-emission technologies where operationally feasible.
- Manage fuel handling, storage activities and accidental release risks to prevent environmental contamination.
- Support energy efficiency, resource efficiency and waste management measures in logistics facilities relevant to C&A services, including measures to reduce packaging, operational waste and improper disposal.
- Cooperate with C&A on relevant environmental data collection, reporting, audits and logistics-related environmental improvement initiatives and targets.

Where waste generated in C&A's operations or supply chain is transported across regional or national borders for treatment, recovery or disposal, such movements may give rise to elevated pollution and compliance risks. C&A therefore expects that cross-border waste shipments are only undertaken where justified on environmental, technical or regulatory grounds. In all cases, such shipments must be managed in accordance with applicable international and national regulations, and be subject to appropriate controls, documentation and oversight to prevent illegal disposal, environmental contamination or loss of traceability.

2.5 Pollution Prevention Targets

C&A sets and discloses its pollution prevention targets through its Corporate Sustainability Strategy (also referred to as Playbook), and annual sustainability reporting.

C&A tracks implementation and supports delivery through the strategic principles set out in Section 2.1, as well as through training, capacity building, technical guidance and integration of pollution-related requirements into supplier engagement processes.

Progress toward these targets is regularly reviewed by the Supervisory Board and the Supply Chain Committee as part of C&A's broader sustainability governance.

3. Roles & Responsibilities

The Sustainability Department is responsible for maintaining this Policy. Overall accountability rests with the Head of Sustainability, who provides strategic oversight and ensures alignment with C&A's sustainability strategy and governance.

The Environmental Stewardship and Sustainable Supply Chain teams lead implementation, including supplier onboarding, supplier guidance, training and monitoring of supplier performance with environmental requirements.

Sourcing and Logistics teams support implementation by engaging suppliers and reinforcing C&A's environmental standards within manufacturing and business partner facilities.

4. Attachments

4.1. Definitions

This section provides an overview of the key terms commonly used at C&A in relation to pollution topics. It aims to promote a shared understanding and consistent terminology across the business.

Term	Description	Source
REACH Regulation	REACH (Registration, Evaluation, Authorization and Restriction of Chemicals) is the European Union's primary regulation governing chemical substances.	European Chemicals Agency – Understanding REACH - ECHA
Substances of very high concern (SVHC)	Substances of Very High Concern are chemicals identified under the REACH Regulation as posing serious risks to human health or the environment.	European Chemicals Agency – Candidate List of substances of very high concern for Authorisation - ECHA
RAPEX	Safety Gate, formerly known as RAPEX (Rapid Alert System for Dangerous Non-Food Products), is the European Union's rapid alert system that enables national authorities to exchange information on dangerous non-food consumer products found on the market.	European Commission – https://ec.europa.eu/safety-gate

PFAS (Per- and Polyfluoroalkyl Substances)	A group of synthetic chemicals used for water- and stain-resistant properties in textiles. PFAS are highly persistent in the environment and are increasingly subject to regulatory restrictions.	OECD – https://www.oecd.org/chemicalsafety
Restricted Substances List (RSL)	A list of chemical substances that are restricted or prohibited in finished products due to potential environmental or health risks.	Apparel and Footwear International RSL Management Group – https://www.afirm-group.com
Manufacturing Restricted Substances List (MRSL)	A list of chemical substances banned from intentional use in manufacturing processes to prevent environmental contamination.	ZDHC Foundation – https://www.roadmaptozero.com
Microfibers / Microplastics	Tiny fiber fragments shed from textiles during manufacturing, washing, or wear that may enter water, air, and soil and contribute to environmental pollution.	European Environment Agency – https://www.eea.europa.eu
CSRD (Corporate Sustainability Reporting Directive)	European Union regulation requiring companies to disclose standardized sustainability information, including environmental impacts such as pollution.	European Commission – https://finance.ec.europa.eu
ESRS E2 – Pollution	European Sustainability Reporting Standard addressing pollution to air, water, and soil, and requiring companies to disclose policies, actions, and targets related to pollution prevention.	European Financial Reporting Advisory Group – https://www.efrag.org

4.2. Related Policies and Documents

1. OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector [OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector \(EN\)](#)
2. ZDHC Manufacturing Restricted Substance List: <https://mrsl-30.roadmaptozero.com/>
3. AFIRM Restricted Substances List: [AFIRM RSL](#)
4. Substances restricted under REACH: <https://echa.europa.eu/substances-restricted-under-reach>
5. Candidate List of substances of very high concern for Authorisation <https://echa.europa.eu/candidate-list-table>