

Product Governance Policy Private Labels

Policy Statement

JD Sports Fashion Plc (“Company”, “Group”, “JD” or “we”) is committed to ensure that all private label (also known as ‘own brand’) products are designed and manufactured in accordance with applicable laws and regulations in all countries in which the Group manufactures, distributes, or sells products.

Suppliers of the Group’s own brand products must comply with the measures identified within this Product Governance Policy. These include regulatory standards covering testing, sampling, pre-production and post-production measures.

Relevant JD employees (actively engaged in the development, sourcing, or other management or administration of own brand products) are required to ensure that our products achieve positive outcomes for customers, by way of supplier products sold by the group meeting the requirements of this policy.

The Group understands that failure to comply with the Product Governance policy may lead to reputational damage for the Group, and/or in Directors, officers and employees of either the Group or our suppliers being subject to civil and criminal penalties.

Who should follow this, Policy?

This policy applies to all territories and locations in which the Group either directly undertakes business, or where business (such as the manufacture of products) is undertaken within the supply chain of the Group.

This policy applies to both suppliers to the Group, and to Group employees or agents acting on behalf of the Group, including sub-contractors.

Regardless of location, all employees are required to undertake business dealings within the spirit and intentions of this policy and must ensure compliance with applicable laws and regulations in all countries in which we operate.

All employees are advised that failure to comply with this policy will be taken seriously and may lead to disciplinary action, up to and including potential dismissal.

Key stages of product governance: Design and sampling

The Group undertakes product governance checks and supervision at multiple stages of the supply chain lifecycle.

Our suppliers are required to ensure that manufacturing processes allow for the timely completion of the following assessment stages:

- Product design Risk assessments undertaken by Group.
- Prototype samples by Group. Assessment to product standard conformance by suppliers, reviewed for quality by Group.
- Product testing Requirements for full product testing are issued by the Group, for our suppliers to undertake. The Group is responsible for ensuring validation of the testing undertaken.
- Size-set samples Fitted and reviewed by the supplier, subject to approval from the relevant Group employee(s)
- Pre-production Samples (manufactured from the bulk production fabric and/or trims) are provided by the supplier, for review and sign-off by the relevant Group employee(s)
- Off-the-line samples The first 'off the production line' shipment samples are assessed by the relevant Group employee(s)
- Fibre composition Must be approved once the relevant product test reports are verified.
- Care labels Must be produced in accordance with the relevant country regulations - from format and symbols to the language.

Key stages of product governance: Manufacture

The group requires suppliers of all products, and raw materials used to construct goods, to be manufactured with regard for the safety of consumers and factory workers, with the consideration for the wider environment.

It is our suppliers (including manufacturers) responsibility to maintain appropriate in-line product quality and safety checks, including:

- Conducting 100% end of line product inspections.
- Undertaking final quality 'AQL inspections' in accordance with MIL-STD-105E BS6001/ISO2859
- Ensuring that all production facilities must maintain and audit a 'Needle and Sharps' policy.
- Ensuring that all products pass through a metal detector that is appropriately situated, maintained and calibrated.

Product governance: Quality

It is the responsibility of the relevant Group employees (including sub-contractors and/or agency staff) to maintain appropriate product quality checks, including:

- Audit of incoming product in accordance with MIL-STD-105E BS6001/ISO2859, typically by the Group Quality Control team. This audit ensures that the product received is verified and validated (for quality) against the approved shipment sample.
- Uses of an accredited third party (presently Intertek) to undertake independent inspections as required at the manufacturing location(s) of products.
- Monitoring of customer returns data, including appropriate escalation (for potentially serious issues) to the relevant Group Product Developer and Sourcing Manager(s)
- The commencement, undertaking, and completion of a 'corrective action process' for product risk identified and documented.

Product governance: Testing and standards

It is the responsibility of the relevant Group employees (including sub-contractors and/or agency staff) to maintain appropriate design and sampling governance, including:

- Ensuring that manufacturers receive the full list of product testing requirements, issued at style level.
- Ensuring that in accordance all relevant international product testing standards are up-to-date and detailed within the Product Testing manual.
- Completion of test reports for components that may include a high-risk component (as highlighted on the AFIRM RSL Risk Matrix) that cannot be substituted with a safer alternative.
- Provide our suppliers with access (our supplier portal, hosted by 'Intertek') Group standards and manuals.
- Completion of product testing via the supplier portal, to ensure verification of the compliance.

Product Governance: Micro fibre standards

Micro-fibre shedding is now undertaken, with Group employees responsible for testing all high-volume fabrics (IHTM method)

Product Governance: Restricted substances standards

Group employees and suppliers must ensure that our product is safe and does not contain any hazardous or restricted substances.

Accordingly, suppliers are required to:

- Follow, and comply with the most recent Restricted Substances List [issued](#) by the AFIRM Group.
 - Provide the Group with product and material samples required to support the completion of the testing procedures within this policy.
 - Comply with the Group chemical management policy, available [here](#)
- JD Group employees are required to:
- Ensure that the Group chemical management processes are undertaken in accordance with the latest regulation and legislature.
 - Work with third-party experts to identify new methods of material testing and product safety checks.
 - Verify supplier compliance undertaken the Group due diligence program via the Group's nominated testing supplier (presently Intertek)
 - Complete local regulation and standard training for our major markets, including but not limited to Prop 65, California.

Product Governance: Animal derived material standards

Our employees are to ensure that any animal-derived materials used in our private label products are limited to leather, wool, and down.

When these materials must be used, the Group employee is to use responsibly sourced materials wherever possible, and to review non-animal origin materials (that meet quality and durability standards) as potential substitutes.

The Group Animal Welfare Policy must be adhered to by our suppliers, and can be found [here](#)

Who is responsible for this Policy?

Group suppliers and employees are responsible for ensuring that their own dealings (on behalf of the business) are undertaken in accordance with this policy.

Group employee and supplier responsibilities also include undertaking sufficient due diligence to ensure that any suppliers or sub-contractors (to one supply chain tier) conform with the requirements of this policy.

The Group management team are responsible for ensuring that their respective business and divisions undertake activities in accordance with this Policy.

The Group ESG Committee is responsible for the approval of the content of this policy.

Support for employees

Any employees that identify a risk associated with product quality or governance should immediately contact their line manager, or the Company Secretary or most senior legal representative for the territory in which they operate.

Employees may report any suspected breach of this policy via either their line manager(s), or via our Whistleblowing Helpline, operated by OneTrust and accessible [here](#), or via 0808 189 1053

Related Policies

- [Environmental policy](#). The Group recognise the importance of minimizing our environmental impact and promoting sustainable processes in our manufacturing supply chains, where available and commercially viable.
- [Chemical Management](#)
- [AFIRM list](#)
- [Animal Welfare](#)
- [Whistleblowing](#)
- [Ethical Code of Practice](#)