

HOUSE OF FRASER

Quality Assurance

Childrenswear Suppliers

- **The manual is designed to be easy to read and use and should cover all the necessary Quality Assurance information required to ensure products are;**
 - **fit for purpose**
 - **of satisfactory quality**
 - **safe when used in a reasonable manner**
 - **and conform to all relevant legal requirements**

- **This manual is designed as guide and should further information be required please do not hesitate to contact the Product Technologist for further clarification.**

Contents

1 Introduction

2 Legal Requirements

3 Manufacturing Standards

4 Labelling and Packaging

5 NDC Inspection and Returns

6 Policies

1. INTRODUCTION

1.1 The House of Fraser Quality Policy

It is essential that the Quality Assurance procedures described in this section are understood and consistently applied. The procedures have been designed to control the quality of goods available in House of Fraser stores and will ensure that the merchandise detailed on the order is delivered to the correct specification at the right time.

Suppliers must operate a Quality Assurance system that ensures that all merchandise is:

1. fit for purpose
2. of satisfactory quality
3. safe when used in a reasonable manner
4. in accordance and conforms to all relevant legal requirements

All suppliers to House of Fraser must take ownership for providing a quality assured service as part of their trading agreement. Suppliers are required to read and fully understand the **Terms and Conditions of Purchase** which you will have received at the commencement of your set up with House of Fraser.

Suppliers must ensure all members of staff fully understand the requirements set out in this manual.

By supplying House of Fraser you are bound to our Terms and Conditions of Purchase which require you to comply with all the Quality Assurance procedures as set out in this pack.

2. LEGAL REQUIREMENTS

2.1 Legal Requirements – Overview

It is the supplier's responsibility to ensure that goods supplied to House of Fraser conform to all relevant UK and European legislation. The safety of our products is vital as we have a responsibility to our customers to supply them with safe products which are fit for purpose.

There are different levels of legislation that exist that need to be applied to our clothing and accessories products. Some are mandatory, some are voluntary but to ensure that we are supplying safe products to our customers we always adhere to voluntary standards and you must make sure that all legislation relevant to your product type is adhered to.

The hierarchy of the different types of legislation as it applies to consumer products is:

⇒ **UK Acts e.g. Trades Description Act 1968**

UK Parliament makes law in the form of legislation, that is, Acts of Parliament, within the UK. They provide the legal umbrella for the development of regulations and directives for specific industries and activities.

⇒ **EU Directives e.g. General Product Safety Directive 2004 (2004/95/EC)**

Directives require EU member states to achieve a certain result while leaving them discretion as to how to achieve the result. The details of how they are to be implemented are left to member states.

⇒ **Regulations e.g. General Product Safety Regulations 2005 (GPSR)**

Regulations are the law and are immediately effective.

⇒ **British Standards & European Standards e.g. BS EN 14878:2007 Textiles - Burning behaviour of children's nightwear**

Standards are designed for voluntary use and do not impose any regulations. However, laws and regulations may refer to certain standards and make compliance with them compulsory.

⇒ **Industry Codes of Practice e.g. Code of practice for the design and manufacture of children's clothing to promote mechanical safety BS 7907:2007**

A Code of Practice is not a legal requirement, but should be considered as defining practices necessary to achieve acceptable levels of safety under the GPSR.

Listed below are the most relevant pieces of legislation that apply to our products that you need to comply with. These pieces of legislation are subject to revision or amendment without notice.

The clothing and accessories specific legislation will be explained in further detail in the sections on “Children’s Clothing” and “Children’s Nightwear”.

Quality and Safety

- The Consumer Protection Act 1987
- General Product (Safety) Regulations 2005
- The Children’s Clothing (Hood Cords) Regulations 1976
- BS EN 14682:2007 Safety of children's clothing - Cords and drawstrings
- BS EN 12935:2001 Feather and Down – Hygiene and cleanliness requirements
- The Nightwear (Safety) Regulations 1985 – British standard
- BS EN 14878:2007 Textiles - Burning behaviour of children's nightwear
- BS 7907:2007 - Code of practice for the design and manufacture of children's clothing to promote mechanical safety

- BS EN 13758-2:2003 Textiles – Solar UV protective properties – Classification and marking of apparel
- The Food Imitations (Safety) Regulations 1989
- EU Toy Safety Directive (2009/48/EC) & BS EN 71 Safety of Toys Tests
- The Dangerous Substances and Preparations (Nickel) (Safety) Regulations 2005
- REACH – Registration Evaluation Authorisation and Restriction of Chemicals

Advertising and Labelling

- Trade Descriptions Act 1968
- Sale of Goods Act 1979 as amended by The Sale and Supply of Goods Act 1995
- The Trade Marks Act 1994
- The Footwear (Indication of Composition) Labelling Regulations 1995
- The Textile Products (Indications of Fibre Content) Regulations 1986 96/74 – updated to EU Textile Names Directive 2008/121/EC
- BS EN 23758:1994 Textiles - Care labelling code using symbols

Suppliers of specialist products are, additionally, required to demonstrate their expert knowledge, including risk assessment procedures and due diligence within their supply chain.

Keeping up to date with regulations, directives, standards and codes of practice can be an onerous task, but there are plenty of resources available to help you keep updated:

www.tradingstandards.gov.uk
<http://www.legislation.gov.uk/>
<http://berr.gov.uk>
<http://www.bsigroup.com/en/>
<http://www.tsoshop.co.uk>
http://ec.europa.eu/consumers/safety/rapex/index_en.htm

Several of the major test houses also produce regular newsletter bulletins to keep you up to date on the latest legislation updates, see the links below.

http://www.bureauveritas.com/wps/wcm/connect/bv_com/Group/Footer/Contact/subscribeform
<http://www.intertek.com/sparkles/>
http://www.sgs.com/cts_newsletter_subscribe_v2.htm?lobld=5547

It is also strongly recommended you purchase copies of any relevant documents directly from the British Standards Institute.

<http://shop.bsigroup.com/>

2.2 Legal Requirements – Children’s Clothing

In this section we will explain the main children’s clothing regulations and what they mean for our clothing and accessories designs, but also how they affect your design and manufacturing procedures.

2.2.1 BS 7907: 2007 - Code of practice for the design and manufacture of children's clothing to promote mechanical safety

This code of practice gives recommendations for the design and manufacture of children's clothing (up to the age of 14 years) to promote mechanical safety. It also covers aspects of packaging and display that apply to retailers.

The code considers the possible hazards and risks that could be caused by fabrics, components, trims and manufacturing processes. It provides recommendations to reduce the risk of hazards through controlling the design and manufacturing elements of children’s clothing.

The risks have been identified through accident statistics and fall into ten main injury types:

1. Ischaemic injuries – loose or untrimmed threads get wrapped around fingers or toes causing a tourniquet effect restricting blood circulation
2. Entrapment of the penis in a zip
3. Injuries from sharp objects
4. Choking and aspiration
5. Swallowing
6. Strangulation, entrapment and tripping
7. Restriction of vision and hearing
8. Suffocation
9. Overheating
10. Slipping, tripping and falling

In order to avoid these injuries risk assessments should be carried out to cover every stage of the garment production process, from design through to manufacture and retailing. It must be remembered that hazards vary depending on the age and development of a child.

This process should identify the potential hazards and remove them wherever possible, or for those that cannot be removed then action should be taken to minimise these risks.

Garment design, materials and construction considerations

1. Fabric considerations

- Fabrics with integral holes, e.g. crochet, should not be used in positions on the garment that would cause entrapment of fingers or other body parts.
- Mesh linings with large holes can cause injuries especially in swimwear if parts of the genitals are trapped in the mesh and expand. Hole sizes should be less than 1.5cm and the handle of the fabric should be soft.
- Pile fabrics should be carefully considered in terms of pile length, pile retention, position in the garment and age of the wearer, particularly for garments for children under 12 months.
- Jacquard fabric with float stitches of longer than 10mm should not be used in the hand or foot area of garments for children under 12 months.

Filling materials

- Should not contain hard or sharp objects (particular care should be taken with feathers as quills can prevent a hazard).
- Should be inaccessible and secure.
- Ensure the seams that encapsulate the filling material are strong enough not to fail in wear.

Sewing thread

- Do not use monofilament thread. Thread used to sew on components should not break at unduly low loads.
- No loose threads or uncut floats longer than 1cm in the hand and foot area of garments up to 1 year.

2. Attached component considerations

- Lockstitch 301 should be used to attach all stitched components.
- Hand stitch or chain stitch are not recommended for any garments for children under 36 months. When they are used they must be carefully controlled.
- The recommended removal force for attached components is either 50N for components under 6mm, or 70N for those over 6mm.

Buttons

- Shouldn't have sharp edges and should pass BS4162:1983 mechanical test.
- Care should be taken if multi component buttons are used as these can disassemble to produce potentially hazardous small parts.
- Buttons should not bear any resemblance to food.
- Spare buttons should not pose any additional risk.

Fabric embellishments, including bows and labels

- Ends should be heat sealed or laser cut and the ends of any embellishments should conform to BS EN 14682.

Rubber or soft plastic embellishments, including labels, badges and tabs (If used on clothing for children under 36 months)

- Stitch density should be considered to ensure needle holes don't cause the embellishment to detach.
- Attachments shouldn't be degraded by heat or by washing detergents.

Pom poms and tassels

- Not to be used on garments for children under 3 years.

Sequins, beads and other similar components

- Must be attached by lockstitch on garments for children under 36 months. (Not by hand or chain stitch (Adda) machine)
- A minimum of three stitches should be used to hold each sequin flat.
- When hand stitching must be used stitching should be locked off after every 10th stitch.

Diamantes and heat fused components

- The attachment security can be affected by:

textured fabric surfaces, highly extensible fabrics, certain fabric finishes, e.g. stain repellency and application on uneven surfaces, e.g. embroideries, prints, pocket bags

- It is essential that processes are in place to ensure the consistency of application.

Press fasteners and similarly applied components

- Post type fasteners should not be used on knitted fabrics - prong type are required (see Metal Components section for further detail)
- Fasteners should not be applied over seams or uneven fabric thicknesses.
- Correct size of fasteners must be used to correspond with the compressed fabric thickness.
- Use fabric reinforcement if necessary.
- Press fastener data sheets should be obtained and used at pre-production and production stage. (See Metal Components section for further detail)

Magnets

- Should not be used on children's garments.

Elastication

- Should be appropriate without introducing a risk to the wearer.
- Relaxed and extended measurements are essential for the manufacturer.
- Can cause restriction in blood flow if too tight. Should be designed with regards to BS 7231 body measurements.

Touch and close fasteners

- Soft qualities should be used for garments for children aged 12 months and under.
- The hook component should be directed away from the child's body where possible.
- Recommended that pieces should be die cut with rounded corners to minimise scratching.

Zips

- Should conform to BS 3084:2006. Ultra light zips should not be used in garments for children under 36 months.
- Zips that come into close contact with the skin should be plastic. Top stops and teeth should be free from sharp edges.
- Zip guards are recommended particularly around the face and neck.
- Preferable that functional zips are not used on boys garments under 5 years.
- All boys' garments with a zip fly should have a zip guard of 2cm wide. Also plastic zips are preferred.

Cords, strings, ribbons and bows

- Should conform to BS EN 14682:2007 Safety of children's clothing - Cords and drawstrings

Neckties

- Conventional neckties are not suitable for children under 5 years old. Touch and close fastener or clips should be used to attach around the neck.

Garments with integral feet

- Consider enhancing the slip resistance by using rubber printed fabric.

Hoods

- Sleepwear for babies under 12 months should not have hoods because of overheating.
- Garments for babies under 12 months should not have hoods made of impermeable material because of the risk of suffocation.
- Consider the restriction in vision that the hood may cause in garments for older children.
- All garments should also comply with BS EN 14682:2007 Safety of children's clothing - Cords and drawstrings

Embroidery and appliqué

- Embroidery or appliqué stitching can rub the skin during wear; consider using fusible interlining on the inside of the garment.
- Stitch lengths on embroideries should not be long enough to form loops. No floats on the front or back in excess of 10mm long.

Stone washing

- Stone washing is not recommended for garments for children under 36 months.
- If used on garments for older children physical measures should be taken to remove any stones and residue.

3. Manufacturing considerations

Sharp objects

- Eliminate the use of pins, staples and other sharp objects in the manufacturing processes. Replace with labels or clamps.

Hand and machine sewing needles

- All manufacturers should have a documented needle control system so that garments are not contaminated with needles or needle fragments.

Knitting machine needles, including linking points and tagging guns

- All manufacturers should have a documented needle control system so that garments are not contaminated with needles or needle fragments.

Metal detection (including needle detection)

- All manufacturers should have a documented and controlled metal detection procedure which is additional to a needle control system.

Machine applied fasteners

- All manufacturers should provide clear instructions to operators on the procedure in place to control the consistency and security of attachment.

Application of glued and heat fused components

- All manufacturers should provide clear instructions to operators on the procedure in place to control the consistency and security of attachment.

Elasticated garments

- Where elastics are used control procedures must be in place to ensure relaxed and stretched measurements are achieved.

Inspection

- Inspection personnel should inspect for foreign objects. Garments with feet should be turned inside out.
- Rejected garments clearly marked and separated.

Testing of the security of attachments should be completed

Documentation and traceability

- Manufacturers should document all procedures relating to product safety. Records should allow batch traceability.

4. Packaging Considerations

General

- Pins and staples should not be used.
- Care should be taken to ensure that packaging does not include small plastic clips that could be a choking hazard to children under 36 months.

Plastic bags

- Bags should be printed with a safety warning.

**PLASTIC BAGS CAN BE DANGEROUS
TO AVOID DANGER OF SUFFOCATION KEEP THIS BAG AWAY FROM BABIES AND
CHILDREN**

- Polythene bags less than 0.038mm thick should be perforated with 6mm holes to reduce the risk of suffocation.

2.2.2 BS EN 14682:2007 Safety of children's clothing - Cords and drawstrings

This European standard has superseded The Children's Clothing (Hood Cords) Regulations 1976. Over the years garment styling has developed into looser and wadded garments which allowed clothing intended for children aged 5 years and over to fall outside the scope of the old legislation.

National accident statistics also indicated that serious accidents involving cords and drawstrings on children's clothing fall into two groups;

- younger children: entrapment of hood cords in playground equipment
- older children: entrapment of cords and strings from the waist and hems in moving vehicles

The aim of this standard is to minimise the risk of accidental entrapment by cords or drawstrings on children's clothing taking into account the child's age, normal behaviour of children for their age and developmental stage. It specifies the requirements for cords and drawstrings for children's clothing, including disguise costumes and skiwear, up to the age of 14 years.

This standard does not apply to:

- shoes, boots and similar footwear
- gloves, hats and scarves
- neckties designed to be worn with a shirt or blouse
- belts and braces

Terms and definitions used in this standard:

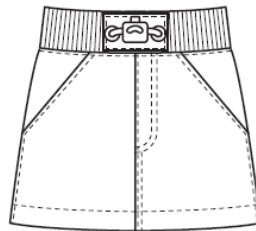
- Young child
Person aged from birth to 7 years (6 years 11 months), which includes all children up to and including 134cms in height.
- Older children and young person
Person aged from aged 7 years up to age 14 years (13 years 11 months), which includes all boys of height greater than 134cms up to 182cms and girl's height greater than 134cms to 176cms.
- Children's clothing
All garments intended by design, production route or selling route to be worn by children up to the age of 14 years, including all garments for boys up to the height of 182cms and for girls 176cms.
- Drawstring
Cord, chain, ribbon string or tape of any textile or non-textile material which **passes through a channel, loop(s) or eyelet(s)** or similar, **to adjust the size** of the opening, or part of the garment **or to fasten** the garment itself.
Note: For some garments a drawstring may be a loop with a tightening device rather than a single length with two ends that may or may not be tied.
- Functional cord
Cord, chain, ribbon, string or tape of any textile or non textile material **with or without embellishment**, such as toggle, pom-pom, feather or bead, **of fixed length** which is used, **to adjust the size** of the opening, or part of the garment **or to fasten** the garment itself.
- Decorative cord
Non functional cord, chain, ribbon, string or tape of any textile or non textile material **with or without embellishment**, such as toggle, pom-pom, feather or bead, **of fixed length**, and **not intended to be used to adjust the size** of the garment **opening or to fasten** the garment itself.
- Halterneck cord

Functional cord worn round the back of the neck holding the garment (e.g. dress, blouse or bikini) top leaving the shoulder and back bare.

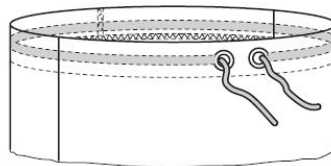
- **Sash**
Drawstring, decorative or functional cord of textile material of **not less than 30mm in width** worn **round the waist of a garment** and tied in a bow.
- **Adjusting tab**
A small strip of fabric, no less than 20mm in width, intended to adjust the size of the opening on a garment, e.g. at the sleeve or ankle.

General requirements

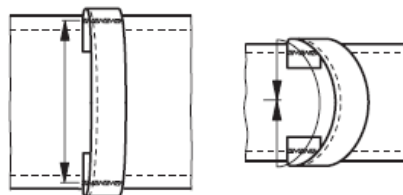
- The ends of drawstrings, functional cords and sashes shall not be knotted and shall be secured to prevent fraying, for example by heat sealing or bar tacking. Doubling or folding of the ends is acceptable provided no hazard of entrapment is created.
- Toggles are not allowed on drawstrings unless there are no free ends but they are allowed on decorative cords, see diagram



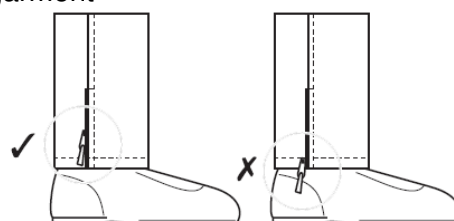
- Children's garments shall not be designed to have drawstrings, decorative cords or functional cords, which emerge from the back of the garment to be tied at the back.
Note: Sashes are exempt
- Drawstrings are permitted in certain parts of the garment for certain ages but the length of the cords protruding is limited.



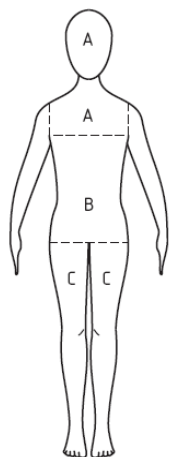
- Fixed loops which protrude from garment shall be no more than 75mm in circumference
Flat loops which do not protrude from garment shall be no more than 75mm in length



- Zip pullers, including any embellishment, shall be no longer than 75mm in length from zip slider and must not hang below edge of garment



The remaining requirements are organised by age group and by body zones.



A: Hood and neck area

B: Chest and waist area

C: Below hip

D: Back

	0-7Y HOOD AND NECK AREA	7-14Y HOOD AND NECK AREA	WAIST AREA (Internal & external to garment)	LOWER HEMS – (garments which hang below the crotch)	BACK AREA	SLEEVES
DRAWSTRING	Not allowed	Allowed but no free ends. No protruding loops when hood is laid flat and extended. When at smallest no protruding loop circ more than 15cms See <i>Fig.4</i>	Free ends should not protrude more than: -extended waist 14cm at each end -relaxed waist 28cm at each end. -Drawstrings with no free ends max loop circ of 28cm when waist is relaxed See <i>Fig.5</i>	Should lie flat against garment when tightened or fastened. N.B Where lower edge of garment is below crotch - should not hang below hem. Where at the ankle or must be inside the garment See <i>Fig.8</i>	Not allowed to emerge from the back	Allowed but inside garment. On short sleeve (finish above elbow) max length protruding when hem extended - 0-7yrs 7.5cm. 7-14yr 14cm. See <i>Fig.9</i>
FUNCTIONAL CORD	Not allowed	Max length of 75mm. No elastic unless shoulder strap or halter neck	Max length of 14cm	Should lie flat against garment when tightened or fastened. N.B Where lower edge of garment is below crotch - should not hang below hem. Where at the ankle or must be inside the garment See <i>Fig.8</i>	Not allowed to emerge from the back	Allowed but inside garment. On short sleeve (finish above elbow) max length protruding when hem extended - 0-7yrs 7.5cm. 7-14yr 14cm. See <i>Fig.9</i>
DECORATIVE CORD	Not allowed	Max length of 75mm, elastic shall not be used.	Max length of 14cm	Should lie flat against garment when tightened or fastened. N.B Where lower edge of garment is below crotch - should not hang below hem. Where at the ankle or must be inside the garment See <i>Fig.8</i>	Not allowed to emerge from the back	Allowed but inside garment. On short sleeve (finish above elbow) max length protruding when hem extended - 0-7yrs 7.5cm. 7-14yr 14cm. See <i>Fig.9</i>
	0-7Y HOOD AND NECK AREA	7-14Y HOOD AND NECK AREA	WAIST AREA (Internal & external to garment)	LOWER HEMS – (garments which hang below the crotch)	BACK AREA	SLEEVES

ADJUSTING TABS	Max length of 75mm	Max length of 75mm	Max length of 14cm	Max length of 14cm and mustn't hang below the hem		Allowed - max length of 10cm
SHOULDER STRAPS	Must be constructed from a continuous length of fabric. Decorative cords attached to the strap No free ends longer than 75mm. Loop no longer than 75mm circ. <i>See Fig.1</i>	No free ends longer than 14cm. Loop no longer than 75mm circ. <i>See Fig.1</i>				
HALTERNECK	No loose long ends, overhead only. <i>See Fig.2</i>	No loose long ends, overhead only. <i>See Fig.2</i>				
ATTACHED TRIMS EG. BOWS / LOOPS	No free ends longer than 75mm. Loop no longer than 75mm circ <i>See Fig.3</i>					
SASHES AND TIED BELTS +3cm wide			If tied at back - no more than 36cm long (from tie point) and do not hang below hem of garment. If tied at front - no more than 36cm long (from tie point) <i>See Fig 6 & 7</i>		Allowed	

Figure 1 – Example of shoulder straps with decorative cords

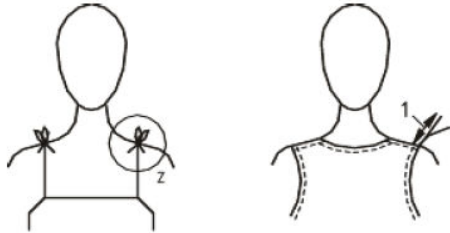


Figure 2 – Example of a halter neck with no loose ends

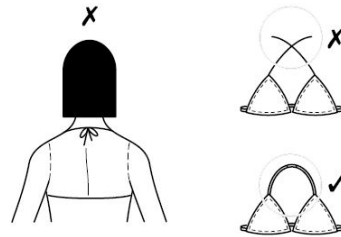


Figure 3 – Example of a permissible trim / bow / loop

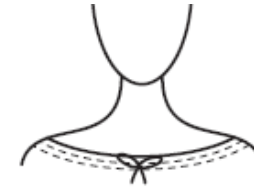


Figure 4 - Example of drawstring on Hoods

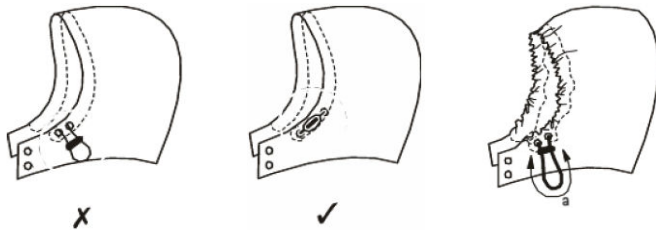


Figure 5 - Example of waist strings

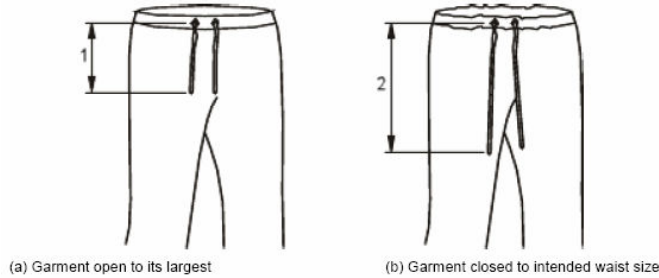


Figure 6 - Permissible sashes and belts at the back

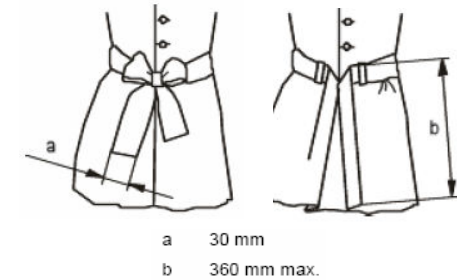


Figure 7 - Example of a permissible tied belt at the front



Belt width 30 mm

Belt length from where it is to be tied 360 mm

Figure 8 - Unacceptable strings at lower hems

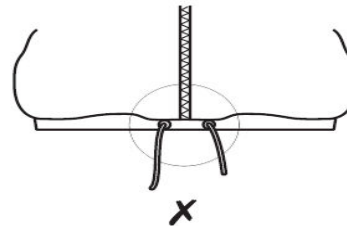
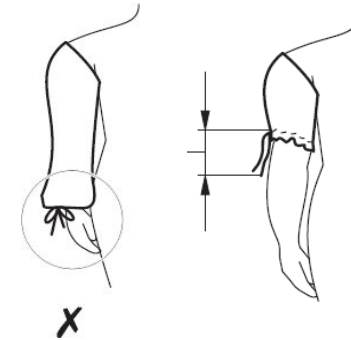


Figure 9 - Examples of sleeves



HOUSE OF FRASER

2.2.3 The Textile Products (Indications of Fibre Content) Regulations 1986 96/74 – updated to EU Textile Names Directive 2008/121/EC

This legislation ensures consumers are given an accurate and consistent indication of fibre content when purchasing textile products. The UK regulations were first passed in 1976; the EU Directive was then issued to eliminate differences in UK and EU interpretation.

It standardises information by creating basic rules for naming the textile fibres appearing on labels, markings and documents which accompany textile products at various stages of their production, processing and distribution.

The main requirements of the directive are:

- All garments must be labelled at the point of sale with the fibre composition.
- Only specific generic fibre names can be used.
- The actual composition of the garment must be within +/-3% of declared label for each component.
- Where a textile product consists of two or more components, e.g. outer and lining, which have different fibre contents - both components should be indicated.
- Pile fabrics – velour, velvet etc. where the pile fibre composition is different from the base, the face must be quoted separately from the back.
- Coated fabrics – the coating must be quoted separately from the base e.g. Outer - 100% nylon with a polyurethane coating
- Trademarked™ or registered® names can only be used in conjunction with the permitted generic fibre name e.g. Lycra® elastane

2.2.4 BS EN ISO 3758:2005 Textiles - Care labelling code using symbols

This standard guides consumers, launderers and dry cleaners on the appropriate cleansing treatment for an article. It uses symbols, numbers and basic wording, so that instructions can be understood easily by consumers in all countries.

The symbols required are:

- Washing - symbols are shown at different temperatures, mechanical actions and reduced or normal rinsing and spinning.
- Chlorine based bleaching symbols.
- Tumble drying at different heat settings.
- Iron symbols are shown giving indications of temperature.
- Dry cleaning symbols - all solvents are listed along with mechanical action or temperature.

The required order of the symbols is shown below.

See <http://www.care-labelling.co.uk> for more information.



HOUSE OF FRASER

2.2.5 The Food Imitations (Safety) Regulations 1989

It is an offence to offer for sale any non-food product or component which has the form, odour, colour, appearance, packaging, labelling, volume or size which is likely to cause people, particularly children, to confuse them with food and put it in their mouth to suck or swallow them.

An example of a product that could breach this regulation are buttons that look or smell like children's sweets or pieces of fruit.

2.2.6 BS EN 12935: 2001 Feather and Down – Hygiene and cleanliness requirements

Feather and down used as a filling material should meet the requirements of this standard to ensure a high level of hygienic and sanitary conditions.

The testing of feather or down material is completed in up to two stages:

1. EN1162 – Determination of the oxygen index number

This indicates the cleanliness of the analysed material and it should be used as a first level of screening, not as a direct indicator of the hygiene state. If the oxygen index number is below or equal to 20 the filling is considered hygienically suitable, as the oxygen level is too low for any harmful bacteria to grow so no further analysis is necessary. If the number is between 20 and 50 the required limits of acceptability of the microbiological state must be met (EN1884). If the number is above 50 the filling is not considered hygienic and has to be reprocessed.

2. EN 1884 - Feather and Down - Test methods - Determination of microbiological state

For milled feather only the microbiological state test applies.

These tests ensure that the feather and down have been suitably processed and washed enough. Limited amounts of specified micro organisms can be considered as indicating 'non contamination' In any case if the microbiological state is exceeded the filling cannot be considered as hygienic.

Mesophil aerobic bacteria count	less than 10 (6) CFU /g
Faecal streptococci count	less than 10 (2) CFU /g
Sulphite reducing clostridium count	less than 10 (2) CFU /g
Presence of salmonella	absent in 20g

HOUSE OF FRASER

2.2.7 The Dangerous Substances and Preparations (Nickel) (Safety) Regulations 2005

This regulation was put in place to safeguard public health. The presence of nickel in certain objects which come into direct and prolonged contact with the skin may cause sensitisation of humans to nickel and may lead to allergic reactions (nickel dermatitis). It applies to any metal components such as rivets, studs, zips, poppers and eyelets.

All metal components which come into direct and prolonged contact with the skin components must, therefore, be tested to:

BS EN 1811:1998 + A1:2008 - release of nickel from products intended to come into direct and prolonged contact with the skin. Nickel release greater than 0.5 micrograms per square cm per week is prohibited.

BS EN 12472:2005 + A1:2009 - measures nickel release after wear and corrosion on coated components. The test is designed to ascertain the durability of the coating. The test also includes BS EN 1811:1999.

2.2.8 EU Toy Safety Directive (2009/48/EC) & BS EN 71 Safety of Toy Tests

This legislation covers products which are categorised as a 'toy'. The definition being any product or material designed, clearly intended, or in any foreseeable way, bearing in mind the normal behaviour of children, used in play by children of less than 14 years of age. It also covers products which are not specifically sold as a 'toy' but may have 'play value'.

Some examples of products not designed as 'toys' but which retain 'play value' so would have to comply with the directive are:

- A hot water bottle cover in the shape of an animal
- A drawstring bag with a children's character printed on the front

Products that are stated as exempt include fashion jewellery for children.

The main requirements of the legislation are that toys must:

- Satisfy safety requirements (termed the 'essential safety requirements' ESR)
- Bear the CE marking
- Bear the required name and address details of the person who takes responsibility for the safety of the toy
- Be accompanied by warnings where necessary
- Information supporting the declaration that toys satisfy the requirements must be kept for inspection by enforcement authorities

In order to satisfy the ESR hazard assessments should be undertaken at the design stage to ensure all of the requirements of the legislation are covered. The Toy Directive doesn't stipulate that testing must be completed, it only requires compliance, but it is difficult to be sure of compliance without testing. House of Fraser, therefore, requires that the final toy should then be tested to the relevant parts of BS EN 71 Safety of Toy Tests to ensure conformity.

HOUSE OF FRASER

Six parts to BS EN 71 have been published; different parts are relevant to different toys. They deal with mechanical and physical properties, flammability requirements, migration of certain elements (i.e. permitted levels of lead, cadmium, etc.), experimental sets for chemistry and related activities, chemical toys other than experimental sets and a pictogram for age warning labelling. Your testing lab will be able to advise you on which parts are relevant to test to.

All toys must bear a CE mark. CE marking is not a safety or quality mark aimed at consumers it is a declaration that the product satisfies the ESR of the directive and any other relevant regulations. The CE mark must be visible, easily legible and indelible. The standard provides specific dimensions for the mark, an example is shown below.

2.2.9 BS EN 13758-1&2; 2003 Textiles - Solar UV protective properties

This standard provides a method for testing fabrics intended to be used in garments that are marketed as having UV protective properties. It also specifies styling and labelling details that are required.

Part 1 – Test method for apparel fabrics

The UPF (Ultraviolet Protection Factor) of a textile material is measured by determining the ratio of transmitted radiation from a UV lamp.

Part 2 - Classification and marking of apparel

Specifies that garments complying with the standard must cover at least the upper and lower body completely, sleeves to finish below the elbow and bottoms to finish below the knee.

In order to pass the standard the UPF value must be larger than 40 and the average UVA transmission should be smaller than 5%.

If all of the above criteria are met then the garment can be labelled with a permanent label stating:

EN 13758-2

UPF 40+








Other labels e.g. swing tickets should include:

- Pictogram as detailed in the standard
- 'Sun exposure causes skin damage'
- 'Only covered areas are protected'
- 'The protection offered by this item may be reduced with use or stretched or wet'
- Can be marked with; 'provides UVA and UVB protection from the sun'

HOUSE OF FRASER

2.2.10 The Footwear (Indication of Composition) Labelling Regulations 1995

Footwear offered for sale to consumers must display a composition label relating to component parts, in the form of a pictogram or in a written format, as shown below.

Parts of the Footwear		Materials / Components	
	UPPER		LEATHER
	LINING & SOCK		COATED LEATHER (Lining of upper and insoles)
	OUTER SOLE (Shoe bottom attached to upper)		TEXTILE (Natural, synthetic or non-woven textile)
			OTHER MATERIALS

The label must indicate the material: 'leather', 'coated leather', 'textile' or 'other materials', which constitute at least 80% of each of the three component parts: upper, lining and sock; outer sole.

The definitions of the parts of the footwear are:

- Upper - Shoe outer face attached to sole
- Lining and Sock - Lining of upper and insole
- Outer Sole - Shoe bottom attached to upper

The definitions of materials and components are:

- Leather - A general term for hide or skin with its original fibrous structure more or less intact, tanned to be rot-proof. Leather is also made from hide or skin which has been split into layers
- Coated Leather - Leather where the surface coating applied to leather does not exceed one third of the total thickness of the product but is in excess of 0.15mm
- Natural textile materials and synthetic or non woven textile materials - Any material woven, knitted, felted, or otherwise produced from, or in combination with, any natural or manufactured fibre, yarn, or substitute
- Other materials - All other materials including plastic, wood, paper etc.

If stickers are used they must be legible, firmly fixed and accessible.

Customers must be informed of the meanings of the pictograms, either by information displayed in shops, catalogues or on websites.

HOUSE OF FRASER

2.3 Legal Requirements – Children’s Nightwear

2.3.1 Introduction

‘The Nightwear (Safety) Regulations 1985’ was the first British standard covering nightwear flammability. In 2008 the EU also issued a harmonised standard, ‘BS EN 14878:2007 Textiles - Burning behaviour of children’s nightwear’.

On the whole, the flammability performance requirements of the UK Regulations are more stringent than those set out in the new European Standard. However, there are some requirements of BS EN 14878 that are a little more onerous or which are different to those prescribed in the UK Regulations. Where parts of the EU standard are less stringent than the UK regulations, the UK regulation will take priority.

Both regulations are described in detail below, along with a summary of which regulation applies to which garment type.

2.3.2 The Nightwear (Safety) Regulations 1985 – British Standard

All children’s garments that are sold as nightwear or commonly worn as nightwear are affected by these regulations. It is an offence to supply nightwear which does not meet these regulations.

The regulations cover children’s nightwear - aged over three months and under 13 years old, including nightdresses, nightshirts, dressing gowns, bath robes and other similar garments.

It excludes cotton terry bathrobes, pyjamas and nightwear for babies under three months. The standard also makes an assumption that nightwear made from synthetic fibres will melt away from the flame rather than burn so, therefore, will meet the flammability performance requirements.

Nightwear covered by the regulations must adhere to and be tested to British Standard BS 5722: 1984, Flammability Performance of Fabrics and Fabric Assemblies used in Sleepwear and Dressing Gowns. The test outlined in the standard assesses whether the whole garment, including sewing threads, trims and labels, is slow burning. The test requires that:

- No specimens sever the 300mm trip thread in less than 25 seconds
- No specimens sever the 600mm trip thread in less than 50 seconds

There are specific garment labelling requirements given, see the ‘Performance and Labelling Summary’ for details.

The regulations also give details of symbols, indicating the flammability performance, that must be used when advertising nightwear in newspapers, catalogues, websites etc.

HOUSE OF FRASER

2.3.3 BS EN 14878:2007 Textiles - Burning behaviour of children's nightwear

The purpose of this legislation was to define a harmonised European procedure for the specification of children's nightwear with regards to their burning behaviour.

This legislation applies to children's nightwear and nightwear fabrics (excluding threads and trimmings). Garments sold as nightwear or intended to be worn as nightwear, *including bathrobes*, dressing gowns, nightshirts, nightdresses and *pyjamas*. It applies to garments from birth age to 14 years.

NB: Cotton terry bathrobes and pyjamas were exempt from the UK regulations but are now covered in BS EN 14878.

Flame retardants

BS EN 14878 specifies that any flame retardants used shall be assessed for risk of toxicity and/or eco toxicity and shall not be used unless considered safe by the EU Scientific Committee on Health and Environmental Risks (SCHER). If there is an absence of such approved finishes by SCHER (which is the case at the time of writing), another means of toxicological assessment of the flame retardant, which includes toxicity and eco-toxicity, could be adopted, for example an Oeko-Tex certification.

BS EN 14878 does not specify a minimum performance requirement to assess durability of flame retardants, only that they must be durable "for the expected life time of the garment" according to "normal washing procedures to which the garment could reasonably be expected to be subjected".

At a minimum, garments with these finishes should be durable to 12 repeat washes according to BS5651:1978 Specification for cleansing and wetting procedures for use in the assessment of the effect of cleansing wetting on the flammability of textile fabric and fabric assemblies, and meet the flammability performance requirements of BS EN 14878 or the UK Regulations as appropriate.

Test Method

The test method measures the time of flame spread and surface flash.

- Class A - No surface flash. 520mm (3rd marker) is not severed in 15 seconds or less.
- Class B - No surface flash. 520mm (3rd marker) is not severed in 10 seconds or less.
- Class C - Babies nightwear - Not tested.

Design Limitations

If fabrics do not pass Class A they must meet certain design / measurement limitations to decrease the risk of flammability as below;

Pyjama tops

- Lower hem circumference must not be bigger than the hip size it is intended to fit plus 20%.
- Hem should not finish more than 10cm below the crotch.
- Cuffs - where the sleeve finishes below the elbow the cuff should not be bigger than 40cm in circumference. No point in the sleeve should be more than 50cm in circumference.

Pyjama trousers

- Hem should not be wider than the knee.

Under BS EN 14878, labelling is optional but if taken, the text to be used is prescribed, see the 'Performance and Labelling Summary' for details.

For further clarification on the differences between the two nightwear standards the department for Business Enterprise & Regulatory Reform ((BERR) (formerly known as DTI)) issued a very useful advisory note for retailers which can be found at:

<http://www.bis.gov.uk/files/file48151.pdf>

HOUSE OF FRASER

2.3.4 Nightwear Performance and Labelling Summary

As the performance and labelling requirements are different for different garment types, as dictated by the two different nightwear standards, see the tables below which summarise the requirements.

Pyjamas		
Category Of Intended Wearer	UK Performance Requirements	Labelling Text
Birth up to (6 months) height 68cm	None	KEEP AWAY FROM FIRE
Over 68cm (6 months) and up to height: Girls 176cm (14 years) Boys 182cm (14 years)	Meet BS EN 14878 <i>EITHER</i> Class A When tested to BS EN 1103 • no surface flash flame • 520mm trip thread severed in not less than 15s • no design limitations OR Class B When tested to BS EN 1103 • no surface flash flame • 520mm trip thread severed in not less than 10s • with design limitations see BS EN 14878	KEEP AWAY FROM FIRE

Bathrobes made of cotton terry towelling only		
Category Of Intended Wearer	UK Performance Requirements	Labelling Text
Birth up to 3 months	None	KEEP AWAY FROM FIRE
Over 3 months and up to 6 months	None	KEEP AWAY FROM FIRE
Over 68cm (6 months) and up to height Girls 176cm (14 years) Boys 182cm (14 years)	Meet BS EN 14878 Class A When tested to BS EN 1103 • no surface flash flame • 520mm trip thread severed in not less than 15s	KEEP AWAY FROM FIRE
Nightdresses, Dressing Gowns		

HOUSE OF FRASER

Bathrobes (not cotton terry towelling) and similar garments		
Category Of Intended Wearer	UK Performance Requirements	Labelling Text
Birth up to 3 months	None	KEEP AWAY FROM FIRE
Over 3 months and up to height 68cm (6 months)	Meet UK regulations, BS 5722: when tested to BS 5438 • 300mm trip thread severed in not less than 25s and • 600mm trip thread severed in not less than 50s	KEEP AWAY FROM FIRE LOW FLAMMABILITY TO BS 5722
Over 68cm (6 months) and up to height Girls 176cm (14 years) Boys 182cm (14 years)	Meet UK regulations, BS 5722: when tested to BS 5438 • 300mm trip thread severed in not less than 25s and • 600mm trip thread severed in not less than 50s	KEEP AWAY FROM FIRE LOW FLAMMABILITY TO BS 5722

Specific labelling guidelines are given in the UK regulations which apply to nightdresses and non cotton terry towelling bathrobes – however, it is good practice to use these guidelines for all nightwear. They state that:

- Any nightdresses treated with flame retardants must also be labelled:

'DO NOT WASH AT MORE THAN 50°C. CHECK SUITABILITY OF WASHING AGENT (in black letters). The words must be in medium letters of 6 point in upper case.

- Labels showing flammability performance and washing instructions **must** be permanent and securely sewn into the garment.
- The words relating to flammability performance may appear in a variety of positions providing that the information is not obscured by any other label or part of the garment. They may appear on:
 - a separate label on the inside of the neck of the garment; **or**
 - any label giving size details of the garment, in which case the wording **must** appear immediately below that information; **or**
 - a label immediately beside any other permanent label giving size details of the garment.

HOUSE OF FRASER

- If both flammability performance information and washing instructions are required and are to appear on the same label the washing instruction warning **must** appear immediately below the flammability performance information.
- The words **must** be in durable print and **must** appear on a label of sufficient colour contrast to enable them to be clearly seen.
- You should note that:
 - If a loop label is used it is recommended that the flammability performance information should be given on the front of the label.
 - For pyjamas, it is recommended that the flammability performance information and any washing instruction warning should be given **at least** on the jacket of the garment.

HOUSE OF FRASER

3. Childrenswear Manufacturing Guidelines

Unless otherwise requested by House of Fraser buying, design or product technology team the following guidelines must be adhered to:

3.1 Garment Design and Construction

- All garments must be compliant to **BS 7907: 2007 - Code of practice for the design and manufacture of children's clothing to promote mechanical safety.**
- All garments must be compliant to **BS EN 14682:2007 Safety of children's clothing - cords and drawstrings.**
- All nightwear must be compliant with **The Nightwear (Safety) Regulations 1985 or BS EN 14878:2007 Textiles - Burning behaviour of children's nightwear** as applicable.
- All garments must have a minimum neck stretch of 56cm for age 0-24 months and 58cm for age 2 and upwards.
- Stonewashing is unacceptable for age 0-36 months.
- All back neck yokes must be doubled so no overlocking is visible on the hanger.
- Back neck seams to be either bound in self fabric, french seamed or have a back neck buggy. No raw edges or seams to be visible.
- All jersey and stretch garments to be constructed using 4 thread overlock on the seams and cover stitch on the hems unless otherwise advised.
- All jersey and knit garments must be taped at the shoulder seams.
- Elastane must be added to the set up course of all knitted garments to ensure sufficient stretch and recovery.
- Jacket / coat fronts, collars and facings must be block fused.
- Rise seams of trousers to be double stitched to strengthen.
- All jetted and welt pockets are to be stitched closed in the centre using a wide stitch leaving a gap at the top and the bottom to show that the pocket can be opened.
- All back vents must be X tacked to hold in place.

3.2 Fabrics

- Fabrics with integral holes, e.g. crochet, should not be used in positions on the garment that would cause entrapment of fingers or other body parts.
- Mesh linings with large holes can cause injuries, especially in swimwear. Hole sizes should be less than 1.5cm and the handle of the fabric should be soft.
- Jacquard fabrics must not have any floats longer than 1cm.
- Pile fabrics with pile longer than 1.5cm are not suitable for ages 0-12 months.
- Excessive pile loss is not acceptable.
- Any faux fur used should be brushed or combed through to eliminate any loose pile and prevent fibre migration.
- All fabric must be free of formaldehyde and comply with the relevant sections of **The House of Fraser Restricted Substances Policy.**
- All children's garments must be machine washable, preferably on a 30° cycle. Any other care instructions must be discussed with the House of Fraser product technologist prior to starting production.

3.3 Stitching

- Core spun thread must be used.
- Monofilament thread must not be used.
- 100% polyester thread must be used on products with low-flammability requirements, e.g. children's nightwear.
- Thread colour to match unless otherwise specified.

HOUSE OF FRASER

- All thread ends are to be securely finished and trimmed, loose ends or loops are not acceptable.
- Float stitches on the reverse side of knitwear, hosiery and gloves must be a maximum length of 1.5cm.
- Seams to have 10 -12 stitches per inch, unless otherwise specified.
- Top stitching to have 8-10 stitches per inch, unless otherwise specified.
- **A strict needle policy must be in place. Records must be available for House of Fraser reference on request.**

3.3.1 Seams and Hems

- No raw edges, unless otherwise specified.
- Hem and cuff turnings to be a minimum of 3cm, unless otherwise specified.
- Linings to finish 3cm maximum shorter than outer shell at hem.

3.3.2 Embellishments

- Ribbon and ties edges must not unravel. Ends must be turned and stitched neatly or heat sealed.
- Ends of cords or ties must not have a rigid fixed end or be knotted.
- Pom poms cannot be used on garments intended for children aged 0-36 months.
- Glass beads are unacceptable for use on any children's clothing irrespective of age.
- Sequins and beads must not be attached by hand or chain stitch.
- Machine attached sequins must have a minimum of 3 stitches to hold the sequin flat. For age 0-36 months sequins and beads must withstand a pull test force of 50 Newton's.
- Diamantés and heat fused decorations must not be attached to uneven surfaces, i.e. textured fabrics, pile fabrics or extendable fabrics. Consistency and security of application must be monitored throughout the production process.
- Embroidery and appliqués must be backed or lined with a fusible interlining to avoid rubbing against the skin.
- Embroidery float stitches should not exceed 1cm in length for children aged 0-36 months.
- All trims/embellishments must be compatible with the base fabric's care instructions.

3.3.3 Metal press fasteners and studs

- All metal components must be nickel free and ferrous free.
- Magnets must not be used.
- Metal fasteners must be selected correctly taking into consideration fabric types and component position.

Metal components must be securely attached using the following guidelines:

- Must not be attached to a single layer of material, components should always be attached through two layers of fabric with an additional layer of interlining.
- Must be positioned on an even foundation, they must not be positioned over seams, stitching or bindings.
- Must not be removed and repositioned.
- The security of the attached metal components must be checked.

HOUSE OF FRASER

Under no circumstances should components be attached by using hand tools. Machinery used to attach the metal components must conform to the following guidelines:

- Machinery and dies must be recommended by, or approved by, the component manufacturer.
- Foot operated machines must have a ratchet mechanism and compensators.
- Machinery must be semi, or fully automated.

All metal components must be consistently attached and application must be monitored throughout production.

Depending on the product there are two ways of monitoring the consistency of application, either pull tests or data sheets, your product technologist will advise you on which is relevant to your product.

Pull Tests

Standard pull tests are to be conducted on all children's clothing as part of the final inspection procedure. Ten items are to be tested each day and results should be documented. A system must be in place for batch identification in case of failure. The results must be documented and available for House of Fraser reference upon request.

Data Sheets

These are technical documents usually used for safety critical products, e.g. poppers on babywear. The sheets give the manufacturer precise measurements against which to accurately measure the attachment of the component. Before production the component manufacturer will complete a data sheet which provides you with information on:

- The recommended fastener type and corresponding machine dies that are to be used.
- Minimum and maximum allowable fabric thickness for each component.
- The actual compressed fabric thickness for the fabric being used.
- The "basic pinch" – or depth – of the component.
- The machine +/- tolerance.
- The final "machine pinch setting" or depth of the applied component along with an acceptable tolerance.

Using a digital calliper the manufacturer can then monitor the "machine pinch setting" as part of their daily production processes. If at any stage the measurements fall outside the allowable tolerance then the components will not be safely attached and corrective action will have to be taken. A system must be in place for batch identification in case of failure. The results must be documented and available for House of Fraser reference upon request.

An example of a completed data sheet can be seen on the next page.

HOUSE OF FRASER

Popper Types

Prong ring / Gripfix press fastener

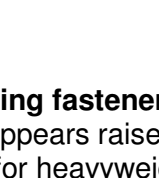
Sits flush with the fabric. Ideal for stretch and knitted fabrics



Prong ring



Socket



Stud



Prong ring

Capped prong ring fastener

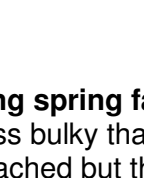
Caps and functional parts can be dyed to match.



Cap



Socket



Stud / prong ring



Socket

S-Spring fastener

Cap appears raised above the fabric
Ideal for heavyweight woven fabrics
Not acceptable on knitted fabrics



Cap



Socket



Stud



Post

Ring spring fastener

Less bulky than the 'S' spring when attached but the male post & stud sections can have sharp edges, so not acceptable for children's clothing.



Cap



Socket



Stud



Post

Jeans tack button

The single post type (the first three shown below) are not acceptable on knitted fabrics.



HOUSE OF FRASER

3.3.4 Buttons

- All buttons must be either two or four hole, to minimize any choking hazard. Shank buttons are not acceptable.
- Buttons must not break under force. Natural / shell buttons are not permitted.
- Two piece or multi component buttons are not permitted for ages 0–36 months and their use for older age groups must be agreed by your product technologist.
- Buttons not should tear the fabric when they are pulled. Functional buttons must be attached through a minimum of two layers of fabric, if this isn't possible reinforce the area of attachment.
- Buttons must be attached by a lockstitch machine with a minimum of ten stitches. Chainstitched buttons are not acceptable.
- Hand stitching of buttons is only allowed with agreement from your product technologist in cases where machine stitching isn't possible. This must be strictly controlled to ensure security, consistency and safety.
- Thread used to attach buttons must be sufficiently strong and withstand the pull test as specified in BS 7907.
- Buttons should not resemble food in order to comply with The Food Imitations (Safety) Regulations 1989.

3.3.5 Zips

- Zips must conform to BS3084:2006 Slide fasteners (Zips) Specification and be made of non toxic elements as stipulated in BS EN 71 Safety of Toys Tests.
- Zips must be ferrous free to ensure that they can be metal detected.
- Zips must be nickel free.
- Zips must have plastic top and bottom stops, metal claw stops are unacceptable.
- Metal zips should not be used on garments for 0-36 months.
- Zips must have an inner fabric zip guard, especially if they are positioned around the face or neck area.
- Zip flies aren't acceptable for boy's trousers up to the age of 5 years, a mock fly should be used instead.
- Zip flies in boy's trousers for 5 years and above must have a zip guard at least 20mm wide secured with a stitching line along the bottom of the guard.
- Where possible all zips must be bagged out.
- All dress and skirt zips, for garments aged 3 years and above, are to have a hook and eye at the top opening. Zip must finish 0.4cm below the top edge to allow for hook and eye.

3.3.6 Other fastenings

- Spring-loaded toggles are not acceptable; instead a rubber toggle and bead should be used.
- Wooden toggles are acceptable; they must be free from splinters and should have a varnished finish.
- Toggles must not be used on drawstrings with free ends unless it is a non-functional decorative cord.
- All cords and drawstrings must comply with BS EN 14682: 2007 Safety of Children's Clothing – Cords and Drawstrings on Children's Clothing – Specifications. See the legal requirements section for full details.
- When using touch and close fastenings the risk of injury needs to be minimised by placing the loop side where contact with a hand is most likely and the scratchy hook side where less contact is likely.
- All touch and close fastenings must be attached with a lockstitch machine and all thread ends should be secured.
- The corners of touch and close fastening must be dye cut rounded corners, to eliminate any sharp points.
- Buckles with moving parts i.e. two or more pieces must not be used on products under 36 months.

HOUSE OF FRASER

3.3.7 Packaging and finishing

- It is a legal requirement for the care labels of all textile products to comply with **EU Textile Names Directive 2008/121/EC & BS EN 23758:1994 Textiles – Care labelling code using symbols**
- All garments are to be labelled “**KEEP AWAY FROM FIRE** “10pt upper case in red.
- Hygiene stickers must be used for all swimwear and intimate apparel.
- Spare buttons must be attached securely to the care label.
- Spare sequin/bead bags can only be attached with a Kimball gun and must be visible at point of purchase
- All sequin/bead bags must carry the warning:
“**Please remove before use. This bag contains small parts which are unsuitable for children aged 36 months and under** ”
- Metal pins and staples are not to be used in packaging.
- All products must be 100% inspected, packaged and be passed through a metal detector. Metal detection records must be available for House of Fraser reference on request.
- Plastic clips should not be used in packaging intended for garments for children aged 0-36 months.
- Plastic bags should carry the warning “**PLASTIC BAGS ARE DANGEROUS. TO AVOID DANGER OF SUFFOCATION KEEP THIS BAG AWAY FROM BABIES AND CHILDREN**”
- Polythene bags less than 80 gauge should not be used.
- All bags must be BHT free.

HOUSE OF FRASER

4. LABELLING AND PACKAGING GUIDELINES

Please refer to **Section 7** of the **House of Fraser Supplier Manual** for guidance on deliveries; referring to **Section 7.1.11** for ticketing and bar code queries.

HOUSE OF FRASER

5. NDC – Inspections, Returns & Recalls

5.1 Pre-Shipment Inspections

It is the responsibility of the supplier or agent to complete a thorough quality inspection of merchandise before it is despatched to House of Fraser.

5.2 House of Fraser National Distribution Centre - Inspections

The inspection should be carried out based on BS6001:Part 1:1991 at a Normal Inspection Sampling Plan Level II. The process of carrying out inspections on an AQL, [Acceptable Quality Level], basis provides an objective assessment of a delivery against the approved Gold Seal Sample. During the inspection, checks for measurements and compliance to Regulations must also be carried out. All samples must be selected at random and any defects found will be rated based on the previously specified categories.

Critical defects are not acceptable under any circumstances.
The Acceptable Quality Level for Major faults is 2.5% and 4% for minor faults.

When goods are received at the National Distribution Centre, the Inspection Unit assesses the delivery against the Gold seal sample. Products are selected for inspection against the Quality Assurance risk matrix and are inspected for the following:-

- Product Construction and Quality
- Labelling
- Appearance/Presentation
- Non-Compliance to Regulations

Merchandise judged by House of Fraser not to be of an acceptable quality may be re-negotiated or rejected and returned to the supplier at their expense. It may be necessary to reject perfect merchandise if it constitutes part of a range where other product is affected by quality. The supplier will be notified immediately if the goods are not of an acceptable quality standard.

Any remediation work identified due to a quality failure or Regulatory non-compliance will be automatically sanctioned for re work and all the costs will be charged back to the supplier. In addition, a penalty scheme applies to all failed deliveries, details of which are sent separately by the NDC compliance team.

5.3 Faulty Non-Compliant Goods - Direct Imports

Any imported goods that do not conform to the purchase order or the approved Gold seal sample will be rejected and the supplier or agent notified. Arrangements will be made to return the delivery to source or dispose of it with written consent.

The Foreign Returns form will be completed to recover all the costs incurred. The supplier must send a sterling cheque to the value of the Foreign Returns form, to House of Fraser within 14 days of receipt of the form.

HOUSE OF FRASER

5.4 Rejected Merchandise and Cancellations

Products which fail to meet the agreed standard or which are over makes and cancellations can only be disposed of according to the following policy:-

- The supplier or a third party can only dispose of products 6 months after the end of the selling season.
- All sewn in labels (with the exception of the fibre/safety label), applied labelling, Kimball's, hangers and printed packaging must be removed. All references to House of Fraser or its brands must also be removed.
- Products which carry permanent brand names, logos or motifs exclusive to House of Fraser cannot be disposed of in the U.K.

5.5 Faulty Store Returns

Faulty merchandise returned by the customer to House of Fraser will be debited back to the supplier and returned unless a Non>Returns agreement has been made.

5.6 Product Re-Call

It may be necessary for both parties to agree a product recall due to either faulty manufacturing or non-fulfilment of legal and safety requirements. The complete cost of the re-call will be charged to the supplier.

HOUSE OF FRASER

6. HOUSE OF FRASER POLICIES

6.1 Supplier Self Evaluation

All suppliers are required to complete a self-evaluation assessment on their sourcing principles and production capabilities.

All manufacturing and processing units are subject to random factory compliance monitoring. The audits will be carried out either by an independent, third party of our choice, or an approved audit organisation of the suppliers choosing with prior written agreement from House of Fraser.

6.2 House of Fraser Policies

Since launching the House of Fraser Ethical Sourcing Policy (ESP) in 2006, we have continued to endorse the importance of responsible sourcing and the promotion of fair and safe working conditions within our supply chain.

The purpose of our House of Fraser Corporate Social Responsibility (CSR) is to work with suppliers to achieve the standards outlined in our policies. The objective is not to terminate or compromise the business relationship but to encourage the continuous improvement of the lives of the workers that produce our goods and give due consideration is given to the effect HoF and our suppliers have on the environment.

HOUSE OF FRASER

6.2.1 ETHICAL SOURCING POLICY (ESP)

Ethical Sourcing Policy

The Group prides itself on being able to offer its customers the newest products in all areas of the business. The Group's buyers continually search for new and exciting products from different parts of the world, and have, over the years, developed long-term relationships with many suppliers. As a result, the Group has consistently offered its customers high quality products.

The Group acknowledges the importance of responsible sourcing and the promotion of fair and safe working conditions within its supply chain. The Group's ESP will recognise the complexity of its supply chain, diversity of product lines and the global citizens who produce them. The intention is to promote high ethical standards within the supply chain without imposing unachievable conditions. The Group's aim is to understand the diversity of its supply chain, embrace local cultures and, through its trading relationships, support livelihoods.

The Group recognises that global influences on employment conditions and human rights are continually changing. In order to keep up-to-date with these changes and developments, we will review our policies periodically.

Sourcing Principles

The Group offers a wide range of goods: clothing, home furnishings, gifts, cosmetics, footwear and food. To create and produce this range of products, most suppliers have their own complex supply chains and the Group aims to understand the diverse components within them. We are aware of the complexity of our supply chain and aim to understand the diverse needs within it. House of Fraser is committed to ensuring our suppliers look at ways of improving the working standards and environment of their workers.

Since the Group is not the direct employer of such workers within these supply chains, it appreciates that achieving our objectives will not be a simple task. There are many constraints on the Group's ability to raise working conditions, particularly where local governments do not enforce the law. However, the Group aims to overcome these constraints through innovative partnerships and a process of continuous improvement.

Where non-compliance is reported, the ESP team will discuss a remediation programme with the supplier and agree a review of the changes within a realistic period. Where a supplier is unable or unwilling to make the proposed changes, the Group will disengage from that supplier without hesitation.

The ESP is communicated to all Group employees involved in the procurement of products. This is to ensure a collective and active role in influencing good practices, in addition to encouraging open and honest dialogue with our suppliers.

Our Approach

The Group's policy framework is necessarily complex, as it recognises the diversity of its product lines and the global citizens who produce these products. The approach is therefore realistic, objective and geared towards continuous improvement. In our relations with suppliers, we do not intend to impose unachievable conditions, which may be counter-productive to the workers and suppliers' interests or which may encourage dishonesty amongst the Group's supply chain. Instead, it endeavours to realise the diversity of our supply chain, embrace local cultures and, through our trading relationships, support livelihoods.

HOUSE OF FRASER

The Ethical Sourcing Code (ESC)

It will be the supplier's responsibility to communicate and implement the Group's ESP within their supply chain. The supplier must assign a senior manager with the responsibility of implementing the code.

Where previous audits have been carried out against a different code, the Group will review such policy to establish compatibility with its own Policy. The ESC will be founded on, and will comprise, the following principles:-

1. Forced Labour

- 1.1 No forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with the employer. However, employers may make copies of the workers documents for purposes of keeping records.
- 1.3 Where workers are required by law to lodge deposits or identity papers, these must be returned to the worker promptly following the termination of employment contract. The holding of such papers should not be used to restrict free movement of workers.

2. Health and Safety

- 2.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 2.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 2.3 Access to clean sanitary facilities and to visibly placed potable water shall be provided. No limits shall be imposed on the number of times workers can take drinks of water or use sanitary facilities.
- 2.4 If accommodation is provided, this should be safe and clean.
- 2.5 A sanitary food storage area shall be provided.
- 2.6 The company observing the code shall assign responsibility for health and safety to a senior management representative.

3. Wages and Benefits

- 3.1 The terms and conditions of employment should be made clear to the worker, either in writing or verbally in a way in which the workers understand them.
- 3.2 Wages must be paid according to the national law or industry benchmark, whichever is the same, or greater than the minimum wage.

HOUSE OF FRASER

- 3.3 Wages must be paid at regular intervals according to the national law or industry benchmark, whichever affords greater benefit.
- 3.4 Deductions from wages not provided for by national law shall not be permitted without the expressed permission of the worker concerned.

4. Working Hours

- 4.1 Workers shall not work in excess of the lesser of (a) the limits on regular and overtime hours allowed by local and national law, or (b) 60 hours a week on a regularly scheduled basis, including overtime. Only under extraordinary business circumstances, and where permitted by national and local law, may 72 hours a week be permitted as an absolute maximum.
- 4.2 Workers shall be guaranteed one day off every consecutive seven-day period.
- 4.3 Overtime shall be voluntary only and workers shall be paid in accordance with national law.

5. Child Labour

- 5.1 No children younger than the greater of 15 years of age, or 14 where the local law allows such exception consistent with International Labour Organization (ILO) guidelines, or the minimum age established by national and local law.
- 5.2 In the event that child labour is found, the supplier should not terminate their employment but look for ways of remediation.
- 5.3 There shall be no new recruitment of child labour.
- 5.4 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

6. Equal Treatment

- 6.1 There shall be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

7. Freedom of Association

- 7.1 Workers, without distinction, have the right to join or not to join trade unions, workers' associations and bargain collectively.
- 7.2 The employer adopts an open attitude towards the activities of trade unions and their organizational activities.
- 7.3 Where this right is restricted by law, the supplier should facilitate the development of parallel means for independent and free association and bargaining such as a workers' council.

HOUSE OF FRASER

8. Discipline

- 8.1 Deductions from wages as a disciplinary measure shall not be permitted.
- 8.2 All disciplinary measures shall be recorded.
- 8.3 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Monitoring the ESC

The purpose of audits is to monitor, inspect and assess the implementation of the ESC. The Group's own-label suppliers are responsible for the auditing, monitoring, reporting and implementation of corrective action plans within their supply chains.

All manufacturing and processing units are subject to random factory compliance monitoring. New suppliers are required to complete a self-evaluation assessment on their sourcing principles and production capabilities, followed by an audit against the Group's ESP. Existing suppliers will be requested to submit an up-to-date social audit report supported by detailed remediation plans for non-compliances.

The Group will use independent consultants with a local presence to verify the accuracy of the reporting and assess the progress on any remediation programme in place. Suppliers must ensure that access to all the factory premises is not restricted and must provide all the information requested by the auditors for verification.

Suppliers will maintain on file, all documentation necessary to demonstrate compliance with the Group's ESP, it being acknowledged that all information provided will be used in the strictest confidence.

HOUSE OF FRASER

Re: Ethical Sourcing Policy (Branded Supplier Programme)

As a leading retailer of brands in the United Kingdom, House of Fraser acknowledges the importance of responsible sourcing and the promotion of fair and safe working conditions within our supply chain. To that end, we have created a Branded Supplier Programme (BSP) for brands and concessionaires. The BSP is a component of House of Fraser's Ethical Sourcing Policy.

House of Fraser's intention is to promote awareness and encourage the adoption of ethical standards within your supply chain. The objective is not to compromise business relationships or terminate them; it is to encourage the continuous improvement of the lives of the workers that produce goods sold to or sold within House of Fraser.

House of Fraser appreciates that some of you may already have a credible ethical programme already in place. House of Fraser defines credible programmes as those, which, at a minimum, have set a standard that aligns with SA8000, Ethical Trading Initiative (ETI), House of Fraser's ESP or benchmarked to other internationally recognised standards. Where this is the case, you are kindly requested to provide us with details of your programme on the Brand & Concessionaire Form attached.

Where there is no social compliance policy in place, House of Fraser encourages you to adopt and implement one. You may choose to adopt House of Fraser's ESP or select a social compliance programme established by organisations such as ETI, SA8000, Wrap, BSCI, Fairwear Foundation etc.

All Brands and Concessionaires are required to sign the attached Brand & Concessionaire Form as a declaration of your commitment to Ethical Sourcing. Signed forms should be returned by email to the Product Technologist.

The ESP constitutes an addition to House of Fraser's current trading terms and conditions. You are required to distribute the Policy to all parties involved in producing goods for House of Fraser.

Feel free to contact us with any questions or concerns. We look forward to a new phase in the development of our business relationship.

HOUSE OF FRASER

BRANDED SUPPLIER PROGRAMME (BSP)

BRAND & CONCESSIONAIRE FORM

Instructions:

1. All Brands and Concessionaires to complete this Form.
2. The signatory must be a member of the management team who is accountable for social compliance.
3. You may provide additional or supplementary information when returning this form.
4. Once completed, please return the form to House of Fraser by e-mail to the Product Technologist
5. As part of our annual review, we will invite a number of brands & concessionaires to share with us their findings and share innovative approaches that could add value to the BSP programme

All suppliers to complete this section

Company Name:	Supplier number:	
Products supplied/ sold within House of Fraser		
Do you have a Social Compliance Program? If Yes , go to section A . If No , go to section B	Yes	No

Section A

How long has the policy been in place?		
Who is responsible for running the program? Name: Position held: Address: Telephone: Fax: Email:		
Are you a member of any CSR related organizations (ETI, BSCI, WRAP, SA8000, Fairwear Foundation, etc.)?	Yes	No
If Yes, which groups?		
Do you produce any external CSR reports?	Yes	No
Are you involved or listed with any Socially Responsible Investment Fund (SRI) or any SRI Index (e.g. FTSE4Good)?	Yes	No
If Yes, which Funds or Indices?		

HOUSE OF FRASER

Has your company, or your suppliers, ever been targeted by NGO's?	Yes	No
If Yes, which groups?		
Is your company currently, or has your company ever, engaged with any NGO's?	Yes	No
Do you have licensee arrangements in place?	Yes	No
Does this arrangement require the licensee to comply with your social compliance code?	Yes	No
Do you monitor your licensees Social Compliance Program?	Yes	No
How often do the licensees report to you on audits and remediation programs?		
Do the licensees operate independently over the management of the Social Compliance program?	Yes	No
If Yes, provide a list of licensees with contact names and details	Yes	No
Are you submitting a copy of your code to 'House of Fraser'?	Yes	No
I understand that all brands & concessionaires are expected to demonstrate a commitment to a Social Compliance Programme		
Signed:	Date:	

HOUSE OF FRASER

Section B

Will you be adopting a Social Compliance program in the next 18 months?	Yes	No
If No give your reasons		
I understand that all Brands & Concessionaires are expected to demonstrate a commitment to a Social Compliance Programme		
Signed:	Date:	

HOUSE OF FRASER

6.2.2 RESTRICTED SUBSTANCES POLICY (RSP)

This Restricted Substances Policy (RSP) details House of Fraser's requirements on the use of chemicals in consumer products, packaging materials, and processes.

This RSP is intended to protect the environment, as well as House of Fraser's employees and customers from exposure to potentially harmful substances.

The RSP applies to both own label and branded suppliers and should be applied to all products supplied to House of Fraser.

Existing legal requirements have targeted specific substances to be banned or restricted from products, packaging materials, & processes. The elimination of potentially toxic or hazardous substances is the first step in providing environmentally conscious products.

1. Marketing & Use Directive (76/769/EEC)

The objective of the Marketing & Use Directive was to protect the general public and the environment from certain dangerous substances and preparations and to ensure the proper functioning of the internal market.

The EU has drawn up a list of substances and preparations to which restrictions on marketing and use apply.

The Directive manages the safety risk imposed by certain dangerous chemicals either by banning or restricting their use. These banned or restricted chemicals are defined in a complete list contained in the Master Directive 76/769/EEC and its amendments

All manufacturers are obligated to comply with the restrictions for use of the chemicals mentioned in the Directive.

Additionally individual product types (e.g. Toys, Cosmetic & Food etc) will have their own specific list of allowed and prohibited chemicals and these should be referred to as required.

Prohibited & Restricted Substances

The Directive gives information on the current relevant legal requirements for bringing products onto the market. The Directives listed within the Master Directive specify banned substances and the acceptable limits for the use of other chemicals.

The Directives should be used to ensure information on these substances is taken into account for product planning, development and design.

The following tables are provided for information only and do not replace applicable legal provisions. It is the supplier's responsibility to check and comply with all relevant National and International Directives & Regulations.

IMPORTANT: Compliance & Monitoring

All House of Fraser suppliers should ensure products are certified to ensure compliance with legal requirements.

Test reports and certification should be made available to House of Fraser upon request.

List of Restricted Substances

HOUSE OF FRASER

Table 1 – Prohibited & Restricted Substances

Material	Restricted Limit
Aliphatic Chlorohydrocarbons	Prohibited
Antimony & its compounds	Restricted
Arsenic & its compounds	Prohibited
Asbestos	Prohibited
Azo-Colourants	Restricted
Barium	Restricted
Beryllium & its compounds	Prohibited
Benzene	Restricted
Brominated Dioxins & Furans	Limits based on sum of substances by group: see Table 3
Cadmium & it's compounds	Restricted
CFC's & Halons	Prohibited
Short Chain Chlorinated Paraffins	Restricted
Chlorinated Dioxins & Furans	Limits based on sum of substances by group: see Table 3
Creosotes	Prohibited
Formaldehyde	Restricted
Hexavalent Chromium & its compounds	Prohibited
Lead & it's compounds	Restricted
Mercury & its compounds	Restricted
Nickel	Restricted
NPEs	Prohibited
PBBs	Prohibited
PCBs & PCTs	Prohibited
Phenols - Pentachlorophenol (PCP) & Salts	Prohibited
PFOS	Prohibited
PAH's	Restricted
Phthalate Plasticisers	Restricted
Polybrominated Biphenyls	Prohibited
Polybrominated Diphenyl Ethers	Prohibited
Toluene & Trichlorobenzene	Prohibited
Tar Oils	Prohibited
Tetrabromobisphenol A	Prohibited
Thiourea	Prohibited
Tri Phosphate	Restricted
Tributyl Tin, Tributyl Tin Oxide, Triphenyl Tin	

List of Restricted Substances

Home (Non Electrical), Apparel & Accessories

Table 2 – Azo Dyes

HOUSE OF FRASER

Azo Dyes	0-Aminoazotoluene	4-amino-azo-benzene
	0-Anisidine	
	2,4,5-Trimethodylaniline	
	2-Naphthylamine	
	3,3'-Dichlorobenzidine	3,3'-Dimethyl-4,4'-diaminodiphenylmethane
	3,3'-Dimethoxybenzidine	
	3,3'-Dimethylbenzidine	
	4,4-methodylenedi-o-toluidine	
	6-methoxy-m-toluidine	
	4,4-methodylene-bis- (2-chloro-aniline)	
	4,4-oxydianiline	
	4,4-thiodianiline	
	4-methodyl-m-phenylenediamine	
	4-Amino azobenzene	
	4-Chloro-o-toluidine	
	5-nitro-o-toluidine	
	Benzidine	
	o-toluidine	
	p-Chloroaniline	
	4-methoxy-m-phenylenediamine	
	4,4-methylenedianiline	4,4'-Diamino-diphenylmethane
	Biphenyl-4-ylamine	4-aminobiphenyl xenylamine

HOUSE OF FRASER

Table 3 – Dioxins & Furans

Dioxins & Furans	Group 1
	2,3,7,8 – Tetrachloro-dibenzo-p-dioxin
	1,2,3,7,8-Pentachloro-dibenzo-p-dioxin
	2,3,7,8-Tetrachlorodibenzofuran
	2,3,4,7,8-Pentachlorodibenzofuran
	Group 2
	1,2,3,4,7,8-Hexachloro-dibenzo-p-dioxin
	1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin
	1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin
	1,2,3,7,8-Pentachlorodibenzofuran
	1,2,3,4,7,8-Hexachlorodibenzofuran
	1,2,3,7,8,9-Hexachlorodibenzofuran
	2,3,4,6,7,8-Hexachlorodibenzofuran
	Group 3
	1,2,3,4,6,7,8-Heptachloro-dibenzo-p-dioxin
	1,2,3,4,6,7,8,9-Octachloro-dibenzo-p-dioxin
	1,2,3,4,6,7,8-Heptachloro-dibenzofuran
	1,2,3,4,7,8,9-Heptachloro-dibenzofuran
	1,2,3,4,6,7,8,9-Octachloro-dibenzofuran
	Group 4
	2,3,7,8-Tetrabromo-dibenzo-p-dioxin
	1,2,3,7,8-Pentabromodibenzo-p-dioxin
	2,3,7,8-Tetrabromodibenzofuran
	2,3,4,7,8-Pentabromodibenzofuran
	Group 5
	1,2,3,4,7,8-Hexabrom-dibenzo-p-dioxin
	1,2,3,7,8,9-Hexabromdibenzo-p-dioxin
	1,2,3,6,7,8-Hexabromdibenzo-p-dioxin
	1,2,3,7,8-Pentabromdibenzofuran

HOUSE OF FRASER

6.2.3 REACH Regulation (EC) No. 1907/2006 REACH Directive 2006/121/EC

REACH is short for Registration, Evaluation, Authorisation and Restriction of Chemicals and is an EU Regulation for the management of chemicals. REACH will eventually reform the whole EU approach to regulating chemicals; REACH requires all manufacturers; importers and downstream users to register the chemicals they use so that it can be determined if these uses are safe or whether the use of certain chemicals needs to be restricted because of their adverse affect human health or the environment.

What does REACH mean for House of Fraser?

REACH will have an impact throughout the supply chain on products and preparations. The Regulations sets out a number of obligations for producers and importers of "articles". The provision is set out as a safety clause to ensure that there will not be any unknown substances coming on the market via an article produced outside the EU.

Retailers are producers when they are selling products under own label. In which case House of Fraser is required to ensure that the manufacturer of a product has registered the use of the substance contained in the product.

REACH Requirements:

Registration

- All producers and importers of chemicals in volumes of 1 tonne or more per year and per producer/importer must register them with the EU Chemicals Agency
- Information regarding their properties, uses, and instructions for safe handling must be submitted to the EU Chemical Agency.
- This safety information must also be passed onto downstream users (manufacturers that use these chemicals in their production processes).
- Non-confidential information can be made available to the public.

Evaluation

- Public authorities will evaluate registration dossiers and highlight substances of concern, requesting more information where necessary.
- Animal testing proposals will be scrutinized by the public authority.

Authorization

- Use-specific authorization is required for all chemicals that are known to cause cancer, mutations, or problems with reproduction or that accumulate in human bodies and the environment.
- Authorization for use will only be granted by the EU Chemical Agency to companies that show that the risks are adequately controlled or if social and economic benefits outweigh the risks where there are no suitable alternatives or technologies.

Restrictions

- Use of certain dangerous substances will continue to be restricted in the EU until the current Directive is revoked and replaced as of 31 May 2009 by the REACH regulation.
- REACH will eventually mean that clearer procedures will be in place and decisions on the use of certain chemicals will be able to be taken more quickly.

HOUSE OF FRASER

When importing products from outside the EU, suppliers will be required to perform the following administrative checks: -

- Identify all chemical substances used in all products
- Work out the total of each chemical used
- Define if they are dangerous and if the total amount used exceeds the thresholds stipulated in the Regulation.
- Find out if the chemical is already been registered for that end use, if not the EU Chemical Agency should be contacted for further advice (<http://ec.europa.eu/echa/>). Please note that the process of "Pre-registering" a chemical does not start until June 2008. Before then it will not be possible to start the registration process.
- Once Pre-registered, a company will have a time window of between 2 and 7 years to complete full registration depending on the chemicals concerned. However if the company does not pre-register by Dec 2008, they will need to complete a full registration before sale.

6.2.4 RoHS: The Restriction of the use of certain Hazardous Substances in Electrical and Electronic Equipment 2006

The Restriction of the use of certain Hazardous Substances in electrical and electronic equipment (RoHS) Regulation aims to limit the environmental impact of electrical and electronic equipment when it reaches the end of its life.

It does this by minimizing the use of hazardous substances and ensuring the harmonization of legislation controlling hazardous substances in electrical and electronic equipment across the Community.

A producer may not place new Electrical and Electronic Equipment (EEE) on to the EU market that contains any of the following substances in amounts exceeding the set maximum concentration values:

- Lead
- Cadmium
- Mercury
- Hexavalent Chromium
- Polybrominated Biphenyls (PBB)
- Polybrominated Diphenyl Ether (PBDE)

Maximum Concentration Values:

For the purpose of the RoHS Regulations, a maximum concentration value of up to 0.1% by weight homogenous materials for lead, mercury, Hexavalent chromium, PBB and PBDE, and of up to 0.01% by weight in homogenous materials for cadmium will be permitted in the manufacture of new EEE

There is no prescribed method to demonstrate compliance, but producers can base compliance on material declarations and/or material analysis.

HOUSE OF FRASER

EEE covered by the RoHS Regulations:

- Large Household Appliances
- Small Household Appliances
- IT and Telecommunications Equipment
- Consumer Equipment
- Lighting Equipment (Including electric light bulbs and household luminaires)
- Electrical and Electronic Tools (With the exception of large scale stationary industrial tools)
- Toys, Leisure and Sports Equipment
- Automatic Dispensers

Exemptions include products where electricity is not the main power source, products where electrical/electronic components are not needed to fulfill the primary function, items placed on the market before 1st July 2006, Batteries, Medical devices, & Military equipment.

Compliance:

A producer shall at the request of the enforcement authority submit within 28 days of the date of request, technical documents, or other information showing that EEE placed on the market complies with the requirements of the regulations.

A producer shall ensure that he retains the technical documents or other information for a period of 4 years from the date that he places EEE on the market

IMPORTANT: Compliance & Monitoring

All House of Fraser suppliers should ensure products are certified to ensure compliance with legal requirements.

Test reports and certification should be made available to House of Fraser upon request.

HOUSE OF FRASER

6.2.5 TIMBER SOURCING POLICY (TSP)

Principles

The House of Fraser (Stores) Ltd Timber Sourcing Policy constitutes Part II of the House of Fraser Ethical Sourcing Policy and applies to both own bought and branded timber product. The main objective of the policy is to encourage the promotion and enhancement of environmental sustainability and good forest management amongst House of Fraser suppliers.

We recognize that our suppliers have their own complex supply chains and we aim to understand the diverse needs within it. House of Fraser has adopted a step-wise approach in implementing the TSP with the eventual goal of suppliers achieving recognised certification.

Where non-compliance is reported, we will discuss the proposed remediation programme with the supplier and agree a review of the changes within a realistic period. Where a supplier is unable or unwilling to make the proposed changes, House of Fraser will disengage from that supplier without hesitation.

The House of Fraser TSP is communicated to all employees involved in the procurement of timber products. This is to ensure we take a collective and active role in influencing good practices, in addition to encouraging open and honest dialogue with our suppliers.

The TSP applies to both own bought and branded timber products and contains guidelines on timber sourcing for all products supplied to House of Fraser.

Our Approach

Our approach is realistic, objective and geared towards continuous improvement. In our relations with suppliers, we do not intend to impose unachievable conditions which may be socially and economically counterproductive for the workers or which may encourage dishonesty amongst our supply chain. Instead, we endeavour to realize the diversity of our supply chain, embrace local cultures and through trading relationships, enhance environmental sustainability and good forest management.

TIMBER SOURCING CODE

It is the supplier's responsibility to communicate and implement our TSP within their supply chain. The supplier must assign a senior manager with the responsibility of implementing the code. All suppliers are required to comply with each principle within the Timber Sourcing Code for all timber products supplied to House of Fraser.

Where a supplier already holds a Chain of Custody (CoC) certificate, or is sourcing from an external CoC certified source, House of Fraser will review the standards of the certification scheme used to establish compatibility with our policy.

The code is founded on, and comprises the following principles:-

1. Known and Legal Origins

1. Known and legal origins
 - 1.1 All timber products supplied to House of Fraser shall originate from a known forest source, with evidence to demonstrate at a minimum the country of forest origin.
 - 1.2 For timber products originating from high risk countries (as listed in Appendix I), evidence to demonstrate that the forest origin is a legal source is required as a minimum (see Monitoring and Certification, below).

HOUSE OF FRASER

2. Compliance with Legislation

2. Compliance with local and national legislation
- 2.1 Suppliers must be able to ensure that timber products supplied to House of Fraser originate from forest sources which are managed in compliance to all applicable local and national legislation. Where sourcing is from a high risk country (as listed in Appendix II), the appropriate levels of evidence is required (see Principle 4). Where sourcing from a low risk country, evidence of country source is sufficient.

3. International Regulations

3. Compliance with International Regulations
- 3.1 For all manufacture of House of Fraser products, the use of timber species within Appendix I of CITES is prohibited. (Please see Annex II of this policy)
- 3.2 Use of species contained within Appendix II and III of CITES, as well as those species listed as Critically Endangered or Endangered on the IUCN Red List, shall only be accepted by House of Fraser with documented evidence that it is sourced from a certified forest area. (Please see Annex II of this policy)

4. Sourcing from High Risk Countries

- 4.1 Where timber is sourced from a 'high risk' country as listed in Annex I of this policy, the supplier is required to provide evidence that all timber or timber products are fully traceable from forest source to point of sale and have been sourced from an accepted House of Fraser verification scheme (see Monitoring and Certification).
- 4.2 Where timber or timber products are sourced from countries not contained within appendix II, evidence of country of origin is sufficient.

HOUSE OF FRASER

Monitoring and Certification

In implementing the TSP, suppliers are responsible for the auditing, monitoring, reporting and implementation of corrective action plans within their supply chains.

House of Fraser recommends that suppliers undergo CoC certification as this ensures that all activities within the supply chain; administration, purchasing, production and sales are accurately documented. In addition CoC provides assurance that the timber products originates from well managed certified forests.

House of Fraser currently endorses the FSC and PEFC certification schemes. However where neither FSC nor PEFC certification is available, House of Fraser will consider other forms of verification in a preferential step-wise manner:

Category 1- National certification schemes whose principles are compatible with those set out in this policy. Where available, this is the preferred form of assurance.

Category 2- Independent schemes to verify progress towards forest certification, which meets the requirements of this policy. Where no other forms of certification are available, this form of assurance is preferred.

Category 3- Assurance of known and legal source. This category will only be accepted with an agreed remedial scheme in place for the specified supplier.

Additionally, House of Fraser uses independent consultants to verify the accuracy of evidence provided for compliance to the policy, reporting and to assess the progress on any remediation programme in place. Suppliers must ensure that access to all facilities within the supply chain is not restricted and must provide all the information requested by the independent consultant for verification.

Suppliers will maintain on file, all documentation necessary to demonstrate compliance with the House of Fraser Timber Sourcing Policy.

All information provided is used in confidence.

HOUSE OF FRASER

ANNEX I

High Risk Areas for Timber Sourcing

Countries in which there is a risk of illegal timber harvesting or where there are other environmental or social concerns about the sourcing of timber products:

Eastern Europe

1. Estonia
2. Latvia
3. Russia
4. Bulgaria
5. Ukraine
6. Lithuania

Africa

1. Cameroon
2. Equatorial Guinea
3. Gabon
4. Ghana
5. Liberia
6. Congo Brazzaville
7. Côte d'Ivoire
8. Democratic Republic of Congo
9. Central African Republic

Asia Pacific

1. China
2. Indonesia
3. Malaysia
4. Papua New Guinea
5. Burma
6. Philippines
7. Thailand
8. Vietnam

Latin America

1. Brazil
2. Ecuador
3. Peru
4. Honduras
5. Bolivia
6. Guyana

N.B. This list is not exhaustive.

HOUSE OF FRASER

ANNEX II

Tree species in CITES Appendices and EU Wildlife Trade Regulation

Species	Common name(s)	Native region	Use
<i>CITES Appendix I/ EU Wildlife Trade Regulation Annex A</i>			
<i>Abies guatemalensis</i>	Guatemala fir	Central America	Timber
<i>Araucaria araucana</i>	Monkey Puzzle	Argentina, Chile	Timber
<i>Balmea stormiae</i>	Ayuque	Central America, Mexico, Brazil	Timber
<i>Dalbergia nigra</i>	Brazilian rosewood Bahia rosewood	Central America, South America, Brazil	Timber
<i>Fitzroya cupressoides</i>	Alerce, Chilean false larch, Patagonian cypress	Argentina, Chile	Timber
<i>Pilgerodendron uviferum</i>	Chilean cedar, Pilgerodendrib	Argentina, Chile	Timber
<i>Podocarpus parlatorei</i>	White pine, Palatore's Podocarp	Argentina, Bolivia, Peru	Timber
<i>CITES Appendix II/ EU Wildlife Trade Regulation Annex B</i>			
<i>Aquilaria malaccensis</i>	Agarwood, aloeswood, eaglewood or gaharu	S. Asia, S.E. Asia	Timber/ medicinal
<i>Caryocar costaricense</i>	Ajo, Garlic tree	Columbia, Costa Rica, Panama, Venezuela	Timber
<i>Gonystylus spp.*</i>	Ramin	S.E. Asia	Timber/ medicinal
<i>Gyrinops spp.*</i>	Agarwood, aloeswood, eaglewood or gaharu	S. Asia, S.E. Asia	Timber/ medicinal
<i>Guaiacum spp.</i>	Lignum Vitae	Honduras, Nicaragua, Panama, Mexico, West Indies, Colombia, Venezuela	Timber
<i>Oreomunnea pterocarpa</i>	Caribbean walnut	Central America, Mexico	Timber
<i>Pericopsis elata</i>	Afrormosia, African satinwood, African teak	West Africa	Timber
<i>Platymiscium pleiostachyum</i>	Cristobal, Granadillo, Quira macawood	Costa Rica, Panama	Timber
<i>Podophyllum hexandrum</i>	<i>Himalayan May-apple</i>	<i>Himalaya</i>	<i>Medicinal</i>
<i>Prunus africana</i>	<i>African cherry, Blackwood, Red stinkwood, Red ivory</i>	<i>Tropical Africa, Madagascar</i>	<i>Timber/ medicinal</i>
<i>Pterocarpus santalinus</i>	<i>Red sandalwood, Saunderswood, Algum, Almug,</i>	<i>India</i>	<i>Timber/ medicinal</i>
<i>Swietenia humilis</i>	<i>Mexican mahogany, Honduras mahogany</i>	<i>Central America</i>	<i>Timber</i>
<i>Swietenia macrophylla (all populations in the Americas)</i>	<i>Big-Leaf mahogany</i>	<i>S. America</i>	<i>Timber</i>

HOUSE OF FRASER

<i>Swietenia mahagoni</i>	<i>Caribbean mahogany</i>	<i>Caribbean</i>	<i>Timber</i>
<i>Taxus chinensis</i> *	<i>Chinese yew</i>	<i>S. Asia, China</i>	<i>Timber/ medicinal</i>
<i>Taxus cuspidate</i> *	<i>Japanese yew</i>	<i>China, Japan, Korea, Russia Far East</i>	<i>Timber/ medicinal</i>
<i>Taxus fauna</i> *	<i>Chinese yew</i>	<i>China</i>	<i>Timber/ medicinal</i>
<i>Taxus sumatrana</i> *	<i>Chinese yew</i>	<i>Philippines and Indonesia</i>	<i>Timber/ medicinal</i>
<i>Taxus wallichiana</i>	<i>Himalayan yew</i>	<i>S. Asia</i>	<i>Timber/ medicinal</i>

CITES Appendix III/ EU Wildlife Trade Regulation Annex C

<i>Cedrela odorata</i> (<i>Population of Colombia and Peru</i>)	<i>Central American cedar, Spanish cedar</i>	<i>Peru, Colombia</i>	<i>Timber</i>
<i>Dipteryx panamensis</i> (<i>Costa Rica</i>)	<i>Almendro, eboe, tonka bean tree</i>	<i>Costa Rica, Panama, Colombia</i>	<i>Timber</i>
<i>Magnolia liliifera</i> var. <i>obovata</i>	<i>Safan, Magnolia</i>	<i>Bhutan, China, India, Nepal, Papua New Guinea</i>	<i>Timber</i>
<i>Podocarpus neriifolius</i> (<i>Nepal</i>)	<i>Black pine, Brown pine, yellow wood</i>	<i>China, Nepal</i>	<i>Timber</i>
<i>Tetracentron sinense</i> (<i>Nepal</i>)		<i>Central and Western China, North Burma, Nepal</i>	<i>Timber</i>

Note:

* Inclusion to Appendix II at the 13th Conference of Party, October 2004

Sources of information:

CITES Appendices (17 February 2005) <http://www.cites.org/eng/app/appendices.shtml>

CITES World, Official Newsletter of the Parties, December 2004

<http://www.cites.org/eng/news/world/14.pdf>

Traffic Europe, Looking Under the Veneer Implementation manual on EU timber trade control: focus on CITES-listed trees, March 2004

http://www.traffic.org/publications/Looking_Under_the_Veneer_TEUR04.pdf

CITES UK, February 2005 http://www.ukcites.gov.uk/pdf_files/GN15%20Timber.pdf