

LANDS' END

SUSTAINABLE PAPER PROCUREMENT POLICY

Our Commitments

Lands' End and its subsidiaries and affiliates are committed to having a positive role in promoting the sustainability of forests and other natural resources. The objective of this policy is to encourage a sustainable combination of resources and processes to produce the paper for:

- catalogues
- internal use
- direct mail

We begin our policy with what we mean by 'sustainable fibre' and then set supplier requirements and a preferred paper supplier programme. This is followed by our commitment to the efficient use of paper and our key principles to achieving such efficiencies. We conclude with reporting guidelines and by stating that this is a living document.

Sustainable Fibre

We will not knowingly source fibre from illegally harvested or traded sources, and we commit to phasing out fibre from other "unwanted" sources. Our long-term goal is to procure paper sourced from:

- ✓ credibly certified forest sources with verified chain-of-custody;
- ✓ recycled sources, with a preference for post-consumer recycled (PCR).

We will work with our suppliers to increase the proportion of paper from these categories. We use principles of lifecycle assessment to comparatively rate the environmental impact of paper procurement choices. In practice, this means working with our suppliers to get more accurate understandings of the lifecycle costs of paper choices based on grade types and fibre sources available.

Supplier Requirements and Preferred Sustainable Supplier Programme

We require all of our paper suppliers to meet our *supplier requirements*. By meeting those requirements and going beyond them, suppliers can also qualify for our *preferred sustainable supplier programme*. The preferred programme gives purchasing preference to suppliers who otherwise meet our price, reliability and quality requirements.

Supplier requirements.

All paper suppliers to Lands' End must ensure that their products are legally harvested and traded. Furthermore, all paper suppliers to Lands' End must demonstrate that they are

progressively phasing out their use of “unwanted” forest sources. An unwanted source falls within one or more of the following categories:

- The source forest is known or suspected of containing high conservation and/or exceptional values, except where:
 - ✓ The forest is certified or in progress of certification under a credible certification standard or
 - ✓ The forest manager can otherwise demonstrate that the forest and/or surrounding landscape is managed to ensure those values are maintained;
- The source forest is being actively converted from natural forest to a plantation or other land use, except where the conversion is justified on grounds of net social and environmental gain, including the enhancement of high conservation and/or exceptional values in the surrounding landscape;
- The timber is conflict timber (i.e., it is traded in a way that drives violent armed conflict or threatens national or regional stability);
- The harvesting or processing entity, or a related political or military regime, is violating human rights;
- The timber is from transgenic genetically modified trees;
- The source forest is unknown.

We will progressively phase out suppliers who do not meet these requirements as they are identified and alternative sources of supply are found.

Preferred Paper Supplier Programme.

Our preferred paper supplier programme provides a positive incentive to suppliers who clearly demonstrate that they source sustainably managed forest products and demonstrate leadership in other environmental aspects of their operations. The preferred paper supplier programme evaluates suppliers on the following criteria:

Fibre Sourcing

- Chain-of-custody Certification: Chain-of-custody Certification is an accounting system audit that tracks certified forest fibre, recycled content and/or non-certified forest fibre. Lands’ End gives preference to suppliers that have third-party independent chain of custody certification. The non-certified forest fibre must meet the controlled wood or non-controversial sources definitions of FSC, PEFC and/or SFI.
- Procurement system certification: Lands’ End gives preference to suppliers that have third party independent certification of their procurement systems that also focus on improving forestry on uncertified lands through logger training, landowner outreach and best management practices.
- Conservation Values: Lands’ End gives preference to suppliers that demonstrate that they are not sourcing fibre from forests that possess one or more of the following attributes, unless the forest is third-party certified to one of the standards that Lands’ End recognises:

- ✓ Forest areas containing globally, regionally, or nationally significant concentrations of biodiversity values (e.g., endemism, endangered species, and refugia).
 - ✓ Forest areas containing globally, regionally, or nationally significant large landscape level forests contained within, or containing, the management unit where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.
 - ✓ Forest areas that are in or contain rare, threatened, or endangered, critically imperilled or imperilled species.
 - ✓ Forest areas that provide essential ecosystems services to nearby human populations in critical sustainable situations.
 - ✓ Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic, or religious significance).
- Certification: Lands' End gives preference to suppliers that provide certification by a third party that a forest is well managed, under a certification system requiring (a) transparency, stakeholder involvement, and the administration of a standard for forest management that is broadly accepted, such as, FSC, PEFC, CSA, and SFI; (b) compatibility between the standard and globally applicable principles that balance economic, ecological, and equity dimensions of forest management; and (c) an independent and credible mechanism for verifying the achievement of these standards and communicating the results to all major stakeholders.

Non-Sourcing Environmental Aspects

- Mill performance: Lands' End gives preference to suppliers that report their mill environmental performance to us annually, based on comprehensive environmental criteria, using the Environmental Performance Assessment Tool® (EPAT) or an alternative assessment tool that allows equivalent comparisons among all the mills that supply Lands' End.
- Greenhouse gas reduction: Lands' End gives preference to suppliers that have programmes to account for and reduce their greenhouse gas emissions.
- Transparency: Lands' End gives preference to suppliers that achieve the highest levels of transparency by publicly reporting their environmental and forestry policies and performance on an annual basis. The reports may be published exclusively on the internet.
- Corporate leadership: Lands' End gives preference to suppliers that demonstrate corporate leadership by participating in voluntary programmes like the Carbon Disclosure Project, and others.
- Environmental management systems: Lands' End gives preference to suppliers that certify their environmental management systems to the ISO 14001, EMAS or other credible international environmental management standards.

Efficient Use

Lands' End is committed to the efficient use of paper and encourages the recycling of paper through the following actions:

1. Appropriateness of size;
2. Appropriateness of paper basis weight;
3. Management of mailing lists;
4. Reduction initiatives, including digital media and versioning;
5. Promotion of the recycling of catalogues and direct mail by customers;
6. Increase internal recycling;
7. Possible use of alternative fibres.

Transparency

Lands' End is committed to the transparent implementation of this policy. Lands' End will require its suppliers to verify their performance against this policy and may require suppliers to audit their compliance with the policy. Lands' End will also report its own performance related to the implementation of this policy.

Living Document

In the spirit of continuous improvement, Lands' End will review this policy on a regular basis and benchmark it against other industry leaders.