

# ICANIWILL SUPPLIER CODE OF CONDUCT

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## 1. About this Code of Conduct

This Supplier Code of Conduct, (hereby referred to as the “Code”) applies to all vendors, Suppliers, sub-suppliers, sub-contractors and business partners (hereby referred to as “the Supplier/s”) which do business with ICANIWILL. It is the responsibility of each Supplier to ensure that the Code is communicated, understood, and followed by all employees and workers, whether permanent or temporary, or contracted through an employment agency.

All Suppliers shall furthermore ensure that any suppliers in their supply chain adhere to the responsibilities set out in this Code.

The Code is based on the ten principles of UN Global Compact and its underlying conventions and declarations, see Appendix 1. The Supplier shall always follow national legislation and, when applicable, follow international legislation with a wide territorial scope. The Code displays minimum requirements to which the Supplier must meet in order to do business with ICANIWILL. If national regulations set out stricter a position than this Code, such regulation shall prevail.

## 2. Human rights

Internationally recognized human rights shall be upheld and respected by all Suppliers doing business, directly or indirectly, with ICANIWILL. All Suppliers shall ensure that there are no violations of human rights in their operations.

### a. Forced labour

All work is voluntary, and the Supplier must not use any form of forced labour, such as trafficking, prison labour, debt-bonded labour or working under threat.

### b. Child labour

Child labour is strictly forbidden, and the Supplier shall take precautionary measures to avoid it. Minimum employee age is 15 years of age, unless local minimum age law stipulates a higher age for work or for mandatory schooling, in which case the higher age would apply. Further definitions in ILO Convention No. 138

Persons under the age of 18 shall not be employed to work at night or conduct heavy or hazardous work, as defined by ILO Convention No. 182.

### c. Equality and diversity

Equality and diversity are promoted in remuneration plans, recruitment processes, promotions, trainings, and in policies concerning parental leave. All employees are treated with dignity and respect.

Discrimination in any form; verbal, physical, or visual, including, but not limited to, gender, gender identity, race, age, sexual orientation, pregnancy status, religion, ethnicity, mental or physical disability, or medical condition, is always prohibited.

The Supplier is prohibited from testing female applicants or employees for pregnancy. Dismissal of pregnant female applicants is not acceptable.

### 3. Labour rights

The Supplier shall ensure their employees are paid a living wage and that there are no breaches of labour rights in own operations or those of sub-suppliers.

#### a. Contracts and remuneration

The Supplier shall have working contracts for all employees that, at a minimum, state working hours, salary, overtime compensation, frequency of payment and notice period. These obligations shall not be avoided through the use of home workers or apprenticeships. Each employee is entitled to a contract written in a language of their understanding.

Salary shall be paid regularly, directly to the employee, at least monthly. No unfair deductions are allowed. All wages shall be at a living wage level.

The Supplier shall set working hours in compliance with applicable laws or according to local industry standards, whichever is greater. Overtime shall be compensated at a premium rate.

#### b. Freedom of Association

All employees are free to form, join or not join any trade union or employee organisation of their choice. All employees have the right to bargain collectively without fear of reprisals.

### 4. Workplace conditions

The Supplier shall provide a safe, clean, and healthy workplace for all employees.

#### a. Health and well-being

All work premises shall be clean and safe, and employees must have ready access to safe drinking water free of charge, lockable and individual toilets, and a sanitary place for food storage. The premises are well-lit, ventilated, and kept at acceptable temperatures and noise levels. Employees shall be given adequate breaks during each day (e.g., 15min morning/ afternoon and time to eat during the day) and sufficient time off between shifts that allows for night rest and household chores.

When accommodation is provided, each employee shall be offered a clean and healthy bed with gender-separated sleeping areas, toilets and showers, which satisfy decent health and safety standards. There shall be no restriction on the employees' right to leave the dormitory during off hours.

#### b. Workplace safety

Attention is paid to safety, and adequate personal protective equipment is provided to employees free of charge when needed. All employees shall receive adequate training to perform their work in a safe way.

Safety instructions, evacuation drills, fire safety, first-aid training, and work-specific training is documented and provided regularly, to all employees, in a language understandable to the employees. Sufficient fire safety is ensured in all workplace operations and there is always a

reasonable number of fire extinguishers, clear evacuation routes, emergency preparedness plans, and first aid kits at the workplace.

At each workplace, a risk assessment must be conducted and accessible to all employees, listing occupational hazards together with preventative measures. Injuries and accidents occurring at all work premises are logged in a record and investigated with preventative measures introduced and progress monitored.

## 5. Environmental protection

The precautionary principle shall always be applied in situations where risk or uncertainty of the safety of a product, substance or compound prevails, and actions shall be taken accordingly.

The Supplier is responsible to have all relevant environmental permits obtained and complied with.

The Supplier should promote the development and use of environmentally friendly technologies and conduct business with as little impact on the environment and public health as possible.

The Supplier should have an environmental policy and program in place with measurable targets and objectives, including a risk assessment to prevent, mitigate, and control the impacts of their operations.

Biodiversity and ecosystem resiliency should not be decreased due to the Supplier's operations.

The Supplier shall collect data regarding materials used, water consumption, effluents, chemicals, the generation of waste and its treatment, greenhouse gas emissions and energy consumption, and provide the data to ICANIWILL upon request.

### a. Energy and greenhouse gas emissions

The Supplier shall minimize emissions by identifying, managing, and monitoring greenhouse gas emissions from their operations, making continuous efforts to align with the Paris Agreement.

Renewable energy sources and fossil fuel free transportation should be prioritized to the furthest extent possible. Suppliers using renewable energy in the factories will be highly prioritized and ICANIWILL will recommend the Supplier to switch to such energy as soon as possible for continued collaboration in the future.

### b. Sustainable use of resources

The Supplier shall make continuous efforts to minimize waste, with procedures in place to separate and dispose of waste properly.

The Supplier should treat solid waste generated from its operation, and reduce, recycle, or reuse it to the furthest extent possible.

The Supplier shall source raw materials in a responsible manner, respecting both environmental and social aspects as well as animal welfare.

The Supplier should Reduce or eliminate deforestation caused by operations.

Animal fibres and other animal materials shall only be sourced from non-endangered, domesticated animals treated in accordance with The Five Freedoms, see appendix 2. Animal cruelty such as mulesing and plucking of live birds is strictly forbidden.

### c. Water and effluents

The Supplier shall use water responsibly and strive towards reducing their consumption of water use regularly. Effluents originating in the Supplier's activities should be managed according to the highest environmental and public health standards, and reuse treated effluents when possible. When necessary wastewater shall be treated and in a closed-circuit system or deposited with a certified contractor.

The Supplier shall have established procedures for notifying local community authorities in case of accidental discharge, release, or any other environmental emergency. A water risk management process shall be in place and be accurately documented and shared with ICANIWILL upon request.

The Supplier should at least reach the minimum requirements in the STWI guidelines, see appendix 3.

### d. Chemicals and hazardous substances

Hazardous chemicals and substances should be eliminated when possible or kept to an absolute minimum. When hazardous chemicals or substances are used, the Supplier shall ensure safe handling, storage and disposal of the substances.

It is not allowed to use hazardous substances restricted under the European Union directive REACH. Supplier must therefore constantly review updates of:

- The candidate list with Substances of Very High Concern, the SVHC list. Under EU REACH regulation, substances that are one of the following can be regarded as substance of very high concern (SVHC):
  - Carcinogenic, Mutagenic or Toxic to Reproduction (CMRs)
  - Persistent, Bio-accumulative & Toxic (PBT)
  - Very Persistent & Bio-accumulative (vPvB)
  - Seriously and/or Irreversibly Damaging the environment or human health, as substances damaging the hormone system

If a substance is identified as an SVHC, it will be added to the Candidate List for eventual inclusion in the Authorization List, regulated under article 33 and will be included in Annex XIV or XVII.

- The Authorization list, Annex XIV, contains priority substances recommended from the Candidate list. Those SVHCs will not be allowed to be used, placed on the market or imported into the EU after a date to be set unless the company is granted an authorization.
- List of restrictions, Annex XVII, contains those substances (on its own, in a mixture or in an article) for which manufacture, placing on the market or use is limited or banned in the European Union.

The three lists mentioned can be found on the website of the European Chemical Agency (ECHA) <http://echa.europa.eu/>.

Substances used are marked with instructions and Material Safety Data Sheet (MSDS).

Buyer reserves the right to conduct third-party controls to ensure no restricted chemicals are present in the Products. If the Products do not comply with these specifications, Buyer has the right to reject the non-conforming Products, as per section 2.a. of the *General Agreement Manual*.

## 6. Anti-corruption

The Supplier shall uphold the highest ethical standards when doing business. Corruption in all its forms, including, but not limited to, bribery, facilitation payments and nepotism is strictly prohibited. The Supplier shall not violate any international-anti corruption conventions, including the UNCAC.

The Supplier should be committed to preventing, detecting and remedying financial crime, including, but not limited to, extortion, money laundering and fraud.

The Supplier should comply with all competition and anti-trust laws, including agreeing to not enter into discussions or agreements with competitors regarding price fixing, market sharing, bid rigging or other similar activities.

## 7. Privacy and data protection

The Supplier shall respect every employee's right to privacy. Privacy data is handled in accordance with GDPR or similar applicable regulations.

### a. Privacy

The Supplier should not interfere with the employees' privacy, family, home or correspondence, and respect the employees' honour and reputation.

### b. Data protection

The Supplier should take adequate measures to protect personal information when personal information is collected, stored, processed, transmitted, or shared.

### c. Documentation

Legal registration documents and government inspection documents are well kept and available for review.

## 8. Supply Chain Transparency

The Supplier shall have knowledge about all information about its own suppliers throughout the entire supply chain. The Supplier will provide this information to ICANIWILL upon request in order to increase supply chain transparency, an important part of ICANIWILL's sustainability work.

## 9. Implementation, compliance, and breaches of the Code

Any material breach towards this Code gives ICANIWILL the right to immediately terminate the order placement and the contract with the Supplier.

ICANIWILL reserves the right to conduct audits, inspections, follow-ups, and standard reviews at all premises and the Supplier will grant insight into systems during audits made by ICANIWILL or by third parties designated by ICANIWILL. On request, the Supplier provides the appropriate resources and documentation at any time of inspection. In the case of identified non-conformities, the Supplier will be asked to provide a corrective action plan for ICANIWILL to approve. If a corrective action plan is agreed upon but not performed by the Supplier, this Code gives ICANIWILL the right to suspend placement of future orders and terminate current production.

Breaches or suspected breaches towards the principles in this Code shall be informed without delay. The Supplier shall maintain procedures to ensure the protection of those who report breaches in good faith. To report a breach, report to following e-mail address [purchase@icaniwill.se](mailto:purchase@icaniwill.se) .

## Appendix 1 – UN Global Compact's Ten Principles

### Human Rights

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2: make sure that they are not complicit in human rights abuses

### Labour

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labour;
- Principle 5: the effective abolition of child labour; and
- Principle 6: the elimination of discrimination in respect of employment and occupation.

### Environment

- Principle 7: Businesses should support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote greater environmental responsibility; and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies.

### Anti-Corruption

- Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.



## Appendix 2 - The Five Freedoms, formalized by UK Farm Animal Welfare Council

1. Freedom from hunger or thirst by ready access to fresh water and a diet to maintain full health and vigour
2. Freedom from discomfort by providing an appropriate environment including shelter and a comfortable resting area
3. Freedom from pain, injury or disease by prevention or rapid diagnosis and treatment
4. Freedom to express (most) normal behaviour by providing sufficient space, proper facilities and company of the animal's own kind
5. Freedom from fear and distress by ensuring conditions and treatment which avoid mental suffering

## 1. Water Efficiency

### 1.1 Compliance with legal and buyer requirements

All applicable legal requirements should be followed. The factory should maintain a legal and compliance register.

### 1.2 Necessary permits available

All necessary permits should be available and up-to date.

### 1.3 Awareness about the source of influent water

Basic awareness about the source of the inflowing water is important. This includes knowledge of what sources of water are used (surface water or groundwater), the local water situation, and who are the other users (for instance farmers or households) that are reliant on the same water source. This awareness contributes to improvement in the impact of the factory's water use on the local environment and community.

### 1.4 Drinking water

Drinking water for all factory personnel should be purified and should meet all parameters required by national legislation. In countries where there is no national standard for drinking water, the quality specified by the WHO Guidelines should be met<sup>1</sup>.

### 1.5 Education on efficient water use

All employees should be engaged through communication and education on efficient water use and correct handling of machines. At this level, the management and production leaders should be educated to spread their knowledge within the factory. Educating them will help employees to make improvements and use water efficiently. Guidelines for education:

- Educate managers and production leaders about water efficiency.
- Educate managers and production leaders about maintenance of technical equipment (machines in production as well as abatement and recovery devices).
- Develop a plan to educate all employees.

### 1.6 Control of the inflowing water

The factory should check the inflowing water. Analysis of it is crucial to assess the quality of the water and determine whether it needs to be treated before use in the processes. Polluted water can harm the processes or necessitate the use of more chemicals and water than would otherwise be needed. The analysis should be conducted regularly to ensure the high quality of the water used in the processes. Treatment processes for inflowing water should be used if the water does not meet the criteria.

### 1.7 Measurement of total water used

The total amount of water used and the total weight of textiles produced should be measured regularly to enable continuous improvements. Monthly self-assessments should be conducted to monitor water use. By keeping track of the water withdrawn and used it is possible to detect water-intensive sub-processes, locate leaks and identify where further actions should be taken. Even small leaks can account for large losses of water.

*Examples of "quick-wins":*

- *Turn off taps and hoses when not in use.*
- *Check water supply pipes e.g. diameters; avoid extremes of temperature; check for leaks.*
- *Repair leaks quickly.*
- *Turn off water-using equipment when not in use.*

### 1.8 Routines for efficient water use

The factory should have clear routines for handling water. By following these routines water usage can be reduced. Small changes, known as 'quick-wins', may not seem to make much of a difference but each drop saved is one less wasted. Such quick wins can be a starting point for the factory to involve the employees in an active water efficiency plan. Machinery checking (i.e. pumps, valves, level switches) and general maintenance should be conducted at regular intervals.

### 1.9 Supporting equipment

Adequate supporting equipment should be used. Having the right equipment is crucial to working efficiently. Water flow measurement equipment should be used and should be calibrated and maintained regularly.

### 1.10 Access to water usage data

The water usage data should be available on site. This data should be retained for at least 24-36 months. At this level, the data should include both the total amount of water used domestically as well as for production.

## 2. Water Pollution Prevention

### 2.1 Compliance with legal requirements

All applicable legal requirements should be followed. The factory should maintain a legal register of all requirements. Depending on which country a manufacturer is located in, these requirements can vary. Areas covered can include storage practices for chemicals, types of chemicals that can be used, and other requirements driven by chemical usage.

### 2.2 Necessary permits available

All necessary permits should be available and up to date. These may have to do with chemical/hazardous material storage permits, safety and fire-department permits, hazardous material disposal permits, etc.

### 2.3 Education about routines for chemical usage

All employees should have appropriate education concerning handling of chemicals and auxiliaries, especially in the case of hazardous substances. The education should include:

- Understanding of the content of the Material Safety Data Sheet (MSDS).
- Awareness of how to use personal protection equipment.
- Emergency plans.

### 2.4 Restricted chemicals should not be used

Chemicals and auxiliaries that are restricted through legislation, voluntary schemes and branch recommendations should not be used.

Buyers also have their requirements, which are shared in the form of a Restricted Substances List (RSL). An RSL identifies the chemicals that a buyer will not permit in their products or in the production process, due to their potential impact on consumers, workers and the environment.

Most manufacturers work with several buyers and so receive several RSLs. These are also updated by buyers from time to time. In order to control RSLs in the production process, a manufacturer-specific RSL should be maintained based on the requirement of all the buyers that the manufacturer is working with.

This activity of preparing and updating the manufacturer-specific RSL should be repeated at least once every six months. This RSL in turn should be circulated by a manufacturer to all its suppliers; and enforced for compliance.

Garment manufacturers develop their RSLs and share them with their wet-processing suppliers. Wet-processing suppliers in turn ought to generate their own RSLs and share them with their chemical vendors.

The best practice with RSLs is to follow the strictest requirements for various chemicals across all buyers and apply this to all products, regardless of the buyer. In cases where some buyers may require certain chemicals which another buyer restricts, the manufacturer will have to decide how to act.

### **2.5 Minimisation of chemicals used**

Any kind of surplus of applied chemicals should be avoided. The chemical consumption at the unit should be measured and monitored.

### **2.6 Information about raw materials**

The raw material should be delivered from the supplier with information concerning the kind and amount of preparation agents, e.g. sizing agents.

### **2.7 Material Safety Data Sheets (MSDS) available for all chemicals**

All chemicals used and stored in the production unit should have an up-to-date MSDS available. The MSDS should be in the local language(s) and readily available to employees.

The MSDS is a specific and detailed description of all the hazardous impacts associated with chemicals. Every MSDS contains 16 different sections which include health, dermal and environmental exposure impact and safety precautions to be taken when exposed or in handling and storage.

It is advisable to ask for an MSDS for each chemical used on the premises and to store a copy of it at the unit. Further, a chart should be made indicating exposure risks and Personal Protection Equipment (PPE) to be used during storage and handling of the chemicals.

### **2.8 Chemical Storage and handling**

A specific person should be appointed as responsible for chemicals. A register of all chemicals purchased, used and disposed of should be maintained. The chemicals should be properly handled, stored and transported according to the instructions of the MSDS. Special compartments should be used for toxic and explosive chemicals. All chemical containers should be properly labelled with chemical name and appropriate danger symbols to minimise potential risks. Containers should be checked for leakage of chemicals during storage and use. Storage space for chemicals should be located on waterproof ground/floor and in a well-ventilated area.

### **2.9 Use of adequate protection**

Appropriate Personal Protection Equipment (PPE) should be used when working with chemicals. PPE includes gloves, safety goggles, masks, aprons and rubber boots, and the use should be based on a risk assessment of the chemical and process in use and the recommendations in the MSDS.

### **2.10 Emergency preparedness and response**

Appropriate emergency provision should be in place at the chemicals handling and storage areas. The emergency equipment should be provided according to a risk assessment of the chemical and process and the recommendations in the MSDS. Emergency provision includes spill kit, absorbent or vermiculite, shovel, plastic bags, protective gear, secondary containment, eye wash fountains, etc.

### 2.11 Equipment

Measuring equipment and dispensing devices for chemicals should be calibrated. This ensures proper dosing, which also gives economic advantages. Vapour balancing lines should be used to transfer the displaced vapours from the container being filled to the one being emptied (for larger tanks).

### 2.12 Disposal of chemical waste

Waste chemicals should be collected and disposed of in an environmentally sound manner, in accordance with current legislation and with the information in the MSDS. Sealed and labelled containers should be used for storing surplus chemicals to guarantee that there is no leakage or scattering. Waste or unused chemicals and empty barrels/containers should be returned to the chemical supplier or a re-cycling company or a licensed waste contractor. Chemicals should not be poured into the wastewater stream or environment.

### 2.13 Access to chemical consumption data

Chemical procurement and consumption data should be systematically recorded. This is applicable to dyes and chemicals as well as auxiliaries.

## 3. Wastewater

The wastewater from the factory can be treated in an effluent treatment plant (ETP) on-site or off-site.

On-site ETPs are owned by the factory and located in direct connection to the factory. "Off-site ETP" is an umbrella term for common effluent treatment plants (CETP), municipal wastewater treatment plants, and publicly or privately owned treatment plants. The focus of these Guidelines is on-site ETPs and ETPs co-owned by the factory, but some basic requirements regarding discharge to off-site ETPs can be found below.

#### *Off-site ETP*

Even when treatment takes place in an off-site ETP and not in connection to the production, an initial mechanical treatment can be done on site to protect the mechanisms of the off-site ETP. In this treatment solid particles can be separated from the wastewater through screening and sedimentation. Factories that discharge industrial wastewater to an off-site ETP should at least follow the requirements listed below:

#### Level 1: Minimum level

- Have a current and valid permit to discharge wastewater to the off-site ETP from all applicable governing agencies.
- Comply with all off-site ETP permit requirements.
- Request and receive documentation of the off-site ETP's compliance with local, state, provincial or
- federal discharge regulations.
- Provide the name and address of the off-site ETP and arrange a visit if requested.
- Measure and document the volume of discharged wastewater.
- Make sure that the capacity of the off-site ETP covers the needs of the factory.

### **3.1 Compliance with legal requirements**

All applicable legal requirements should be followed. The factory should maintain a legal register.

### **3.2 Necessary permits available**

All necessary permits should be available and up-to-date.

### **3.3 Knowledge of discharge point for treated wastewater**

Knowledge of the discharge point for the treated wastewater is important. It should be known which recipient receives the treated wastewater (for instance lake, river, sea or wetland) and which water users are reliant on that recipient. This knowledge contributes to a higher awareness of the impact of the factory's wastewater discharge on the local environment and community.

### **3.4 Basic knowledge on operation of the ETP**

The performance of the ETP depends not only on the design of the treatment process, but also on its operation and maintenance. To ensure that the ETP is run properly, the operators need to be technically competent and well-trained. The employees operating the ETP should:

- Have basic knowledge of the water flow in the factory and of the function of the different wastewater treatment steps.
- Have a relevant education and appropriate competence to make basic measurements to ensure the consistent quality of the treated water.
- Be competent to take representative samples. The sampling point and how the samples are taken are essential to obtain correct results.

### **3.5 Connection to ETP**

The factory should be connected to an ETP, which should be running continuously when the factory's wet processes are running. A flowchart indicating the water flow through the dyeing process and the ETP should exist. A wastewater emergency plan should also be available to be used in the event of a wastewater treatment plant breakdown.

### **3.6 Sufficient capacity of the ETP**

The capacity of the ETP and the amount of water used in the factory should be known. Even during the peak season, the production should not exceed the capacity of the ETP or its permits and licences. The amount of wastewater should be measured daily and records kept on site. The factory should not install piping that allows process water to bypass wastewater treatment.

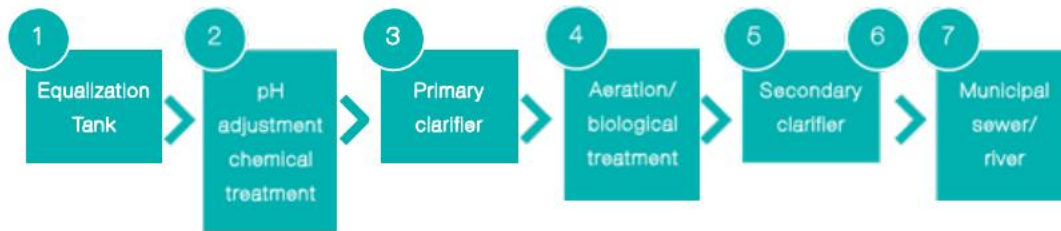
### **3.7 External control**

The treated wastewater should be analysed by an external laboratory as required by law. The results should not exceed legal discharge limits and should be kept on site.

If guidance from legislation is missing, at least pH, biological oxygen demand (BOD), chemical oxygen demand (COD), total suspended solids (TSS), total dissolved solids (TDS) and temperature should be analysed by a third party on at least a quarterly basis. The third party should collect the samples at least at point 1 and 7, shown in Appendix 8. The test results should not exceed the discharge limits stated in Appendix 7. In addition to the results, the test report should include information on the test method, detection limit and lab contact info and should be kept on site in the legal register mentioned above.

### **3.8 Basic in-house analysis of the treated wastewater**

At least pH, TDS, colour and temperature should be analysed on site daily. The sampling points should be at least at point 1 and 7, shown in the recommended sampling points below, and the records should be kept on site.



### 3.9 Quality of the treated wastewater

The quality of the treated wastewater should comply with the legal requirements.

### 3.10 Knowledge of the quantities of obtained sludge

The amount of sludge obtained should be measured weekly.

### 3.11 Sludge management

The legal requirements on sludge management and disposal should be followed. Sludge temporarily stored on-site should be tightly wrapped and be placed on a cast concrete foundation with a protecting roof.

### 3.12 Access to water and sludge data

The water and sludge quality and quantity data should be available on-site. At this level the data should include the parameters specified by law. The monitoring data of water, sludge quality and quantity should be retained for at least 24-36 months. The composition of sludge should be regularly tested in order to check and track its toxicity.