



Labl Fashion

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CONTROLLED OPERATIONAL MANUAL

Sustainability, Organic Colour and Circular Bioeconomy Manual

Translate Labl Fashion's environmental and circular commitments into controlled material, chemistry, resource, waste, durability, repair and bioeconomy practices.

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Review	Annual and after material legal, operational, incident or strategy change
Classification	Controlled internal and approved partner-use document

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1. Purpose, scope and authority

Translate Labl Fashion's environmental and circular commitments into controlled material, chemistry, resource, waste, durability, repair and bioeconomy practices.

SCOPE Applies to product design, sourcing, materials, organic/natural colour research, production, energy, water, chemicals, packaging, waste, repair, returns, recovery and environmental claims.

This manual supports the Labl Fashion Strategic Plan and Comprehensive Business Plan 2027–2030. It does not replace applicable Kenyan law, binding customer/partner requirements, professional advice or a more stringent approved control. Where requirements conflict, work must pause and the manual owner must obtain an authorised decision.

2. Governing principles

- Prevention and durability precede recycling or recovery.
- Natural or organic origin does not automatically mean safe, low-impact or colourfast.
- Materials and chemistry are approved for use, market and evidence scope.
- Environmental claims require boundary, method, baseline and status.
- Circularity is counted after receipt and verified disposition, not from intention, QR scans or collection promises.

3. Roles and accountability

Role	Core accountability
Sustainability lead	Own environmental programme, evidence, objectives and claims.
Product/R&D lead	Apply material hierarchy, durability, repair and controlled trials.
Procurement	Source approved materials, supplier evidence and change notification.
Operations	Control energy, water, chemistry, yield, waste and housekeeping.
Organic-colour lead	Control feedstock, recipe, safety, tests, wastewater and scale gates.
Circularity coordinator	Manage repair, returns, triage, partner routes and final disposition.
Labl Farms/partners	Provide authorised regenerative, organic-colour or bioeconomy evidence under agreement.

4. Standard operating procedure

The following sequence is the minimum controlled workflow. The owner may add risk-based checks, but may not omit a required approval, evidence or safeguard without an authorised exception.

4.1 Aspect and baseline

Identify material environmental aspects; measure defined energy, water, chemistry and waste baselines.

4.2 Design review

Apply need, durability, repairability, material simplicity, disassembly and end-route questions.

4.3 Material approval

Evaluate composition, origin, performance, restricted substances, supplier evidence and claim scope.

4.4 Organic-colour trial

Question, feedstock, recipe, mordant/auxiliary, risk, wastewater, test, limitation and adoption decision.

4.5 Production controls

Marker yield, cut waste, chemical issue/use, spills, utilities, maintenance and segregated residuals.

4.6 Repair/return

Receive, identify, assess safety/condition, decide repair/reuse/repurpose/recycle/recovery/disposal.

4.7 Partner transfer

Qualify route, quantity, chain of custody, commercial terms and evidence of final disposition.

4.8 Review and claims

Compare outcome to baseline, verify method and approve only proportionate communications.

5. Control matrix

Control point	Required control
Material hierarchy	Preferred, conditional and prohibited material/chemistry decisions with rationale.
Safety data	Current safety information, labels, storage, PPE, issue control and emergency response.
Trial gate	Laboratory/pilot/production scale requires documented acceptance and environmental permissions.
Wastewater	No discharge without lawful and technically approved route.
Waste measurement	Defined categories, units, owner and reconciliation to batch/process.
Return status	Physical receipt and condition evidence before circular outcome is reported.
Biodiversity/community knowledge	Consent, benefit, IP and access terms before feedstock or knowledge use.

6. Exceptions, incidents and escalation

1. Stop or contain any condition that presents immediate danger, illegality, serious harm, uncontrolled loss, material product risk or unauthorised disclosure.
2. Notify the supervisor/manual owner promptly; preserve people, physical and digital evidence without obstructing urgent care or legal duties.
3. Classify the event, assign an owner, document immediate correction and determine customer, worker, community, regulator, insurer, funder or Board notification.
4. Investigate proportionately, identify contributing and systemic causes, approve corrective/preventive action and verify effectiveness before closure.
5. Record authorised deviations with reason, scope, duration, compensating controls and expiry; repeated exceptions require system change or escalation.

7. Records and evidence

Records must be accurate, dated, attributable, legible, protected, retrievable and retained under the approved retention schedule. Personal, customer, community, financial, research and security information receives access proportionate to risk.

Required record	Minimum evidence expectation
Environmental aspect register	Owner, date/period, subject, decision/status, source or attachment, approval where required and retention location.
Energy/water/waste baseline	Owner, date/period, subject, decision/status, source or attachment, approval where required and retention location.
Material approval	Owner, date/period, subject, decision/status, source or attachment, approval where required and retention location.
Chemical register/SDS	Owner, date/period, subject, decision/status, source or attachment, approval where required and retention location.
Organic-colour trial record	Owner, date/period, subject, decision/status, source or attachment, approval where required and retention location.
Spill/incident log	Owner, date/period, subject, decision/status, source or attachment, approval where required and retention location.
Repair and return register	Owner, date/period, subject, decision/status, source or attachment, approval where required and retention location.
Partner transfer and disposition certificate	Owner, date/period, subject, decision/status, source or attachment, approval where required and retention location.
Claims evidence file	Owner, date/period, subject, decision/status, source or attachment, approval where required and retention location.

8. Performance indicators and management review

Indicator	Review question
Material-lot evidence coverage	What does material-lot evidence coverage show about effectiveness, risk, trend, root cause and required decision?
Marker yield	What does marker yield show about effectiveness, risk, trend, root cause and required decision?
Waste per unit/batch	What does waste per unit/batch show about effectiveness, risk, trend, root cause and required decision?
Energy and water intensity	What does energy and water intensity show about effectiveness, risk, trend, root cause and required decision?
Approved chemistry coverage	What does approved chemistry coverage show about effectiveness, risk, trend, root cause and required decision?
Repair success	What does repair success show about effectiveness, risk, trend, root cause and required decision?
Returns with verified disposition	What does returns with verified disposition show about effectiveness, risk, trend, root cause and required decision?
Environmental incidents	What does environmental incidents show about effectiveness, risk, trend, root cause and required decision?
Claims exceptions	What does claims exceptions show about effectiveness, risk, trend, root cause and required decision?

The manual owner reviews indicators monthly or quarterly according to risk, reports material exceptions through the management pack and proposes changes during annual management review. A positive metric never overrides evidence of harm, legal breach or stakeholder grievance.

9. Competence, communication and training

- Identify roles that require induction, supervised practice, formal qualification, refresher training or independent authorisation.
- Assess competence through observed performance, records, tests, work results or authorised sign-off—not attendance alone.
- Communicate changes before their effective date and confirm affected users can access the current controlled version.
- Withdraw access or require supervision where competence has expired, changed or proved insufficient.
- Retain training, assessment, authorisation and refresher records.

10. Review, change and approval

Trigger	Required action
Annual review	Confirm continued suitability, legal/contractual alignment, evidence, indicators, incidents and user feedback.

Trigger	Required action
Material incident or audit finding	Review affected control immediately and implement approved corrective change.
Legal, market or system change	Obtain competent review before the new requirement or release becomes effective.
Process/organisation change	Update roles, records, training, permissions and continuity arrangements.
Manual revision	Issue new version, change summary, approval, effective date and superseded-version withdrawal.

Appendix A — Operational templates

The following templates form the minimum annex set. The manual owner may issue controlled electronic equivalents in LaDOS or another approved system.

A.1 Material hierarchy checklist

Field	Required entry
Reference and date	Unique number, date/time and related customer/project/order/partner/person as applicable.
Owner and participants	Responsible owner, contributors, reviewer and approval authority.
Facts/evidence	Objective information, source, attachments, system references and limitations.
Decision/action	Decision, conditions, immediate control, actions, due dates and status.
Verification/closure	Verifier, effectiveness evidence, closure date and residual issue.

A.2 Organic-colour trial protocol

Field	Required entry
Reference and date	Unique number, date/time and related customer/project/order/partner/person as applicable.
Owner and participants	Responsible owner, contributors, reviewer and approval authority.
Facts/evidence	Objective information, source, attachments, system references and limitations.
Decision/action	Decision, conditions, immediate control, actions, due dates and status.
Verification/closure	Verifier, effectiveness evidence, closure date and residual issue.

A.3 Chemical approval form

Field	Required entry
Reference and date	Unique number, date/time and related customer/project/order/partner/person as applicable.
Owner and participants	Responsible owner, contributors, reviewer and approval authority.
Facts/evidence	Objective information, source, attachments, system references and limitations.
Decision/action	Decision, conditions, immediate control, actions, due dates and status.
Verification/closure	Verifier, effectiveness evidence, closure date and residual issue.

A.4 Waste and residual log

Field	Required entry
Reference and date	Unique number, date/time and related customer/project/order/partner/person as applicable.
Owner and participants	Responsible owner, contributors, reviewer and approval authority.
Facts/evidence	Objective information, source, attachments, system references and limitations.
Decision/action	Decision, conditions, immediate control, actions, due dates and status.
Verification/closure	Verifier, effectiveness evidence, closure date and residual issue.

A.5 Repair/return triage

Field	Required entry
Reference and date	Unique number, date/time and related customer/project/order/partner/person as applicable.
Owner and participants	Responsible owner, contributors, reviewer and approval authority.
Facts/evidence	Objective information, source, attachments, system references and limitations.
Decision/action	Decision, conditions, immediate control, actions, due dates and status.
Verification/closure	Verifier, effectiveness evidence, closure date and residual issue.

A.6 Disposition certificate

Field	Required entry
Reference and date	Unique number, date/time and related customer/project/order/partner/person as applicable.
Owner and participants	Responsible owner, contributors, reviewer and approval authority.
Facts/evidence	Objective information, source, attachments, system references and limitations.
Decision/action	Decision, conditions, immediate control, actions, due dates and status.
Verification/closure	Verifier, effectiveness evidence, closure date and residual issue.

A.7 Environmental-claim checklist

Field	Required entry
Reference and date	Unique number, date/time and related customer/project/order/partner/person as applicable.
Owner and participants	Responsible owner, contributors, reviewer and approval authority.
Facts/evidence	Objective information, source, attachments, system references and limitations.
Decision/action	Decision, conditions, immediate control, actions, due dates and status.
Verification/closure	Verifier, effectiveness evidence, closure date and residual issue.

Appendix B — Approval

This manual becomes controlled when approved by the authorised Labl Fashion authority. Printed copies are uncontrolled unless specifically registered.

Approved by	Capacity	Signature	Date
	Board Chair / delegated authority		
	Managing Director / Venture Lead		
	Manual owner		