

Limited Brands Paper and Forest Products Procurement Policy

Limited Brands is committed to working with our paper and other forest products suppliers and other stakeholders, on a continuous improvement basis, to ensure that all paper and forest products used in our operations originate from sources that are managed in a manner that is consistent with the conservation of natural resources, environmental protection, and the protection of the rights of indigenous peoples and local communities. As a first step in laying out our commitment and communicating our expectations to our paper and forest products suppliers and other stakeholders, including our customers, employees, shareholders and environmental NGOs, we have developed the following forest products procurement policy that sets forth our vision and provides principles that will guide purchasing decisions. The following principles apply to all paper and forest products sourced by Limited Brands, including those made from wood fiber, such as paper for catalogs, and marketing, office, and packaging papers and materials

Limited Brands is committed to playing a leadership role in the catalog and retail industry and will form partnerships with other retailers and related paper buyers (e.g. printers, magazines) in order to promote sustainable forest management and maximize leverage for the protection of endangered forests.

This policy addresses the entire paper and forest products lifecycle, from commercial timber management to manufacturing. This policy also supports principles that result in long-term environmental, social and economic benefits.

Responsible Forest Management

Limited Brands recognizes the need to support and encourage the adoption of environmentally and socially responsible practices to ensure that fiber used in our paper is sourced from well-managed timberlands, and that land use choices and management practices contribute to the conservation of natural resources and environmental protection.

- ***Conservation of Endangered Forests and Protection of Biodiversity and Ecosystems:*** Limited Brands will give preference to suppliers who work toward conservation of endangered forests and the protection of biodiversity and ecosystems contained within these forests.¹ Limited Brands also recognizes that certain regions have been identified as priority regions for forest conservation and biodiversity by the conservation science community and other stakeholders, and will work toward phasing out and finding suitable alternatives to any fiber sourced from these regions, specifically:
 - Endangered Forests and ecosystems¹

¹ Limited Brands recognizes definitions and identifying traits and characteristics and traits of endangered forests, which have attained broad acceptance by the conservation science community, environmental NGOs or other stakeholders, such as the Wye River Coalition's Endangered Forests definitions. Limited Brands also seeks to reflect changes in the consensus definition of endangered forests as it continues to develop over time, and will consult with the World Resources Institute Global Forest Watch Program and other resources that we believe may be helpful.

- Forests harboring a rich array of biodiversity that have been heavily impacted by human activity²,
- Global forest types that are naturally rare and threatened,³
- Forested wilderness areas, including those that are rich in species diversity,⁴ contain threatened species,⁵ or provide critical ecosystem services, and
- Old growth forests that have not previously been subject to commercial logging.
- Plantations that have been established where a natural forest existed as of 1994.

Limited Brands will help protect endangered forests in all regions where its suppliers source forest and paper products, and recognizes the following priority regions: Canadian boreal forests, U.S. National Forests, Canadian and U.S. coastal and inland temperate rainforests, Indonesia, Chile, Atlantic forests of Brazil, and the Cumberland Plateau of the U.S. where commercial fiber production for pulp and paper plays a defining role in land use choices and natural resource management.

No Conversion: Limited Brands will use its position to influence paper suppliers to abandon the practice of conversion of natural forests to plantations. The company will not knowingly source paper products from sources that actively convert natural forests to plantations, and will not buy wood or paper products that originate from forests that were converted after 1994.

- **Best Practices in Timberland Management:** Limited Brands will encourage our paper and forest products suppliers to develop forest management plans based on quantitative and internationally recognized information regarding the conservation of natural resources and environmental protection on all lands owned or managed by their companies. Where our paper and forest products suppliers source from independent land managers, Limited Brands encourages these suppliers within their procurement systems, to require the development and implementation of forest management plans that assure protection of endangered species and habitats, as well as the maintenance of ecosystem services at the landscape level. Limited Brands will avoid sourcing paper and forest products originating from commercial timber operations that convert or promote the conversion of natural forests to monoculture wood fiber plantations or non-forest land uses. Limited Brands will source paper products with fiber originating from well-managed, longstanding existing plantations or from new fiber plantations established on

² Of particular note are the forested “biodiversity hotspots” – ecoregions located mainly in the tropics and identified by conservation scientists as having a minimum of 1500 endemic plant species and as having already lost 30 percent or more of their original habitat.

³ World Wildlife Fund has defined global rarity as biomes or major habitat types represented by less than 8 distinct regions around the world. Included in this category are temperate rainforests and Mediterranean habitats.

⁴ Wilderness areas are characterized by at least 1 million square kilometers that have a population density of less than 1 person per square kilometer. The “high biodiversity wilderness areas” include a minimum of 1500 endemic plant species.

⁵ Threatened species as designated by the IUCN Red List as well as NatureServe’s Conservation Status rankings for imperiled species that are at high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines in populations, or other factors. See <http://www.natureserve.org/explorer/ranking.htm#mean>.

degraded agricultural or pasture lands and managed in keeping with responsible silvicultural practices and landscape-level conservation objectives

- **Forest Restoration and Recovery:** Limited Brands will give preference to paper suppliers who supplement their land management plans with natural forest restoration and recovery initiatives, particularly in areas where most of the original extent of habitat has been lost and where continuing deforestation pressures threaten large numbers of species with extinction.⁶
- **Forest Certification:** Limited Brands is committed to increasing the amount of certified fiber in our paper and forest products and, in particular, will give purchasing preference to products endorsed under the Forest Stewardship Council (FSC) certification program, where such products are available and appropriate to Limited Brands' needs and where certification is consistent with this policy's provisions on conservation of endangered forests and biodiversity. Limited Brands does not give exclusive preference to any single forest certification program, and will evaluate the claims of different certification programs based on demonstrated contributions to positive conservation outcomes for forest species, sites and landscapes.
- **Illegal Logging:** Limited Brands is committed to working with our paper and forest products suppliers and other stakeholders to ensure that illegally sourced fibers are not used in the paper and forest products we source, and that suppliers comply with all other relevant legal requirements. Among other efforts, we will work with our paper and forest products suppliers to ensure that tropical hardwood species covered under the Convention on International Trade in Endangered Species (CITES) and wood sourced from illegal logging operations are avoided. Limited Brands will also not source wood fiber from countries with well-documented persistent patterns of unchecked illegal logging, including unlawful timber extraction inside designated protected areas or "conflict timber" associated with human rights abuses.

Recycled Content: Sourcing recycled fiber can reduce overall pressure on natural forests and other important natural resources, especially when fibers from post-consumer wastes are used in paper production.

- Limited Brands recognizes these benefits and will give preference for recycled papers, for catalogue and non-catalogue use, sourced from post-consumer waste fibers where economically feasible and quality requirements can be met.
- Limited Brands will also encourage our suppliers to develop and test additional recycled content papers for use in our catalogs and other paper products, and to continuously improve and expand availability of recycled content papers for all catalogue and paper end uses.

⁶ The biodiversity hotspots are ecoregions located mainly in the tropics and identified by conservation biologists as having a minimum 1500 endemic plant species and as having already lost 30 percent or more of their original habitat.

Pollution Prevention: Paper manufacturing is a resource-intensive process that can lead to air and water emissions that impact overall environmental quality.

- Limited Brands will purchase paper only from suppliers that meet or exceed legal environmental performance requirements for pollution control.
- Limited Brands encourages its suppliers to monitor and reduce overall emissions by adopting the latest technologies that minimize pollution impacts.
- Limited Brands will not purchase papers manufactured using elemental chlorine bleaching processes and encourages its suppliers to move toward process chlorine free and totally chlorine free bleaching.

Efficient Paper Use: Limited Brands is committed to improved efficiency in paper use, including efforts to reduce duplicate mailings and other inefficiencies in catalog distribution systems. Additionally, Limited Brands promotes continuous technical advances in paper weight reduction, fiber use efficiency, printing methods to minimize process waste, substitution of recycled content for virgin fiber, and increasing the percentage of certified fiber, with preference for FSC. Additionally, Limited Brands encourages suppliers to conduct research into the use of alternate fiber sources, such as agricultural waste.

Research and Contributions to Conservation Projects: Recognizing the need for additional research into biodiversity values of forest ecosystems, for conservation of areas with high levels of biodiversity, and for education and awareness programs, Limited Brands will support such efforts, among others, and show preference for suppliers who do the same.

Implementation Strategy: As a part of Limited Brands' commitment to the conservation of natural resources and environmental protection, and to leadership and continuous improvement in these areas, we support the following implementation strategy for our policy:

- **Legal Compliance:** Limited Brands is committed to working with our paper suppliers and other stakeholders on compliance with all relevant legal requirements.
- **Commitment to Multi-stakeholder Engagement:** This policy was developed as a multi-stakeholder effort between Limited Brands, its paper suppliers and environmental NGOs. Limited Brands is committed to continuing broad stakeholder engagement on the environment, and to collaboration, including partnerships, and will give preference to suppliers who engage in multi-stakeholder, landscape-level conservation planning initiatives to identify and protect endangered forests and wilderness areas where priority areas for conservation are being defined.
- **Reporting:** Limited Brands is committed to transparent reporting of progress made in the implementation of this policy, will provide information on our progress to stakeholders via the environmental section of our website, and will seek to maintain open communication with stakeholders.
- **Incumbent Suppliers:** Limited Brands will work with current suppliers who were selected before the implementation of this policy to influence them to supply information to assess their practices compared to this policy. The company will use its influence to promote identified improvements. Failure by the companies to provide information or engage in identified improvements will result in non-renewal of contracts and may result in contract termination, depending on terms of the contract.

- ***Continuous Improvement:*** Limited Brands is committed to continually assessing its progress under this policy and making improvements to further long-term environmental, social and economic benefits.