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U.S. COTTON TRUST PROTOCOL ®

The U.S. Cotton Trust Protocol
Claims Framework

Version 3.0 - June 2025

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Contents

Section A: General information

A1. About the U.S. Cotton Trust Protocol

The U.S. Cotton Trust Protocol (hereafter Trust Protocol) is the voluntary sustainability program for U.S. cotton growers and traceability platform for all U.S. Cotton.

The Trust Protocol's mission is to create a sustainable standard for U.S. Cotton that is data-powered, traceable by design, and generates positive impact through the global cotton value system – from farms to finished product.

Our vision is to be the world's most trusted fiber program where full traceability is a reality and continuous, measurable improvement of our environmental footprint sets the standard for the global market.

Read more about our program on our website.

A2. Terms and Definitions

Refer to effective version of **U.S. Cotton Trust Protocol Terms and Definitions** for the definition of terms used in this manual. Defined terms are highlighted in italics in the first instance they are used in this document. **Bolded** terms are names of other U.S. Cotton Trust Protocol normative documents.

A3. About the Claims Framework

A3.1 Introduction and Scope

This document is designed to govern and provide guidance to all members of the Trust Protocol when communicating their commitment to the Trust Protocol mission and vision, their participation, and any results stemming from their involvement in the program.

This framework is designed to ensure that only validated and credible *Trust Protocol Claims* are made, protecting the reputations of all parties involved but also creating strong tools that will enable robust impact communications regarding the Trust Protocol.

A.3.1.1 This document allows for, but is not limited to, application used with the following communications channels:

a. **Stakeholder-facing:** Company website and sustainability/CSR pages, Investor and stakeholder communications, Internal employee communications and employee training, Intranet, Social media, Press opportunities, Speaking engagements, CSR Reports.

- **Target audiences:** Employees, Consumers, NGOs, Investors, Governmental Agencies, Board of Directors, Business partners and Suppliers

b. **Consumer-facing:** Ecommerce websites, in-store applications, on-product messaging. These types of channel communications are recognized for their importance in driving value for Brand- Retailer Members, but also will be governed by higher levels of criteria for eligibility as defined in this framework.

- **Target audiences:** Consumers

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A.3.1.2 Trust Protocol claims are available to all members, with enhanced claims accessible to Brand-Retail members consuming *Protocol Consumption Units (PCCUs)*. A quick reference guide to marketing claims in provided in [Appendix A](#).

- Once enrolled and on-boarded into the Trust Protocol, Brand-Retail Members can access verified data related to environmental outcomes of the Trust Protocol program and enhanced supply chain transparency. With access to this data, Brand-Retailer members could more credibly and effectively communicate to their stakeholders about the environmental outcomes associated with their consumption of eligible material, enhanced visibility into their supply chains, their commitment to sustainable practices and products, and their company's alignment with the core principles of the Trust Protocol.

A.3.1.3 The Trust Protocol Chain of Custody Requirements provide the necessary measures to control the movement of products that contain *Protocol Cotton* and *Tracked U.S. Cotton* purchased and sold by Trust Protocol members, in order to demonstrate and validate the claims made about those products.

A.3.1.4 The *Protocol Consumption Management Solution* (PCMS) harnesses distributed ledger and other digital technologies to record and verify the movement of its cotton along the entire supply chain, validating for Brand-Retail Members their consumption of Tracked U.S. Cotton and Protocol Cotton across their entire supply chains and into their finished products. Using the PCMS, Brand-Retail Members can make claims based on data-backed, verified PCCUs linked to their consumption of Tracked U.S. Cotton or Protocol Cotton.

- Read more about our how our consumption solution works [here](#).

> *Please note that the Trust Protocol does not link the source of volumes of Tracked U.S. Cotton or Protocol Cotton to specific Trust Protocol participating farms. Members should not represent or otherwise imply that the physical cotton in a specific product has come from a specific Trust Protocol farm.*

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A.3.2 Changes to the Claims Framework in this version (v2.1 to v3.0)

Section	Changes from version 2.1	Significant/ minor/new	Comment
Throughout	Reformatting of numbered clauses to support clarity and version tracking	Minor	Each clause individually numbered
Throughout	Reformatting of layout style to improve user experience	Minor	
Throughout	Minor edits to language to enhance clarity without altering meaning	Minor	
Legal requirements and due diligence	Addition of relevant updated legal requirements	Minor	
Legal requirements and due diligence	Addition of claims 'period of validity'	New	
Legal requirements and due diligence	Addition of 'false claims' clause	New	
Describing the program	Replacement of program description statements	Minor	Aligns to updated program strategy
Statements on regenerative agriculture	Incorporation of statements describing regenerative practices	New	
Aggregate program outcomes	Incorporation of statements describing regenerative practice uptake	New	Aligns to annual report outcome data
Aggregate program outcomes	Addition of aggregate data trend statements	New	Enabled as a result of program maturity at four years
Volume specific claims	Addition of a combined claim of consuming Tracked U.S. Cotton and Protocol Cotton	New	
On-product claims	Additional text to clarify the types of product labels permitted	Minor	
On-product claims	Updated on-product labels	Significant	Response to member feedback to create greater distinction between the two fibers
On-product claims	Updated criteria	Significant	Aligns with the Trust Protocol Chain of Custody Requirements
Brand retailer transfer	Updated to reflect system capability to share value chain traceability map between brands	Minor	

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B1. Overview: U.S. Cotton Trust Protocol Statements and Claims

The table below sets out the claims categories covered by this document. This is intended to provide a quick reference to claims eligibility by member type. Please refer to specific sections in this document as outlined in the table to see additional claims requirements.

Claim type (Document section)	Non-members	Supporting members	Grower participants	Aggregator members	Mill & Manufacturer members	Brand & Retail members	Brand & Retail members consuming PCCUs
a. Statements							
i. General statements (Section D)	✓	✓	✓	✓	✓	✓	✓
ii. Participation statements (Section D and E1)	✗	✓	✓	✓	✓	✓	✓
iii. Program outcome statements (Section E2)	✗	✗	✗	✗	✗	✗	✓
iV. Consumer-facing statements (Section E3)	✗	✗	✗	✗	✗	✗	✓
b. Claims							
i. Consumption claims (Section B3)	✗	✗	✗	✗	✗	✗	✓
ii. On-product claims (Section E4)	✗	✗	✗	✗	✗	✗	✓
iii. Use of assigned environmental metrics (Section E6)	✗	✗	✗	✗	✗	✗	✓

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B2. Statements

B.2.1 General statements: Publicly available and are intended to support all stakeholders in describing or making general reference to U.S. Cotton, and to add context to communications about the Trust Protocol program and practices. The Trust Protocol believes in continuous improvement across all U.S. cotton production and has therefore made some general statements about U.S. cotton. Use of these statements **does not require Trust Protocol membership. The Trust Protocol name, logo and all related intellectual property are protected under trademark laws.** See example statements and guidance in Section D.

B.2.2 Participation statement: Specific to your category of membership and are intended to support members in communicating their support for, participation in, and commitment to, the Trust Protocol program to a range of audiences. See example statements and guidance in Section D and Section E1.

B.2.3 Program Outcome Statement: Intended to be used to describe the overall program achievements and to reference progress of specific environmental indicators against environmental goals. **Making a Program Outcome Statement associates a member's participation with program outcomes and can only be used by Brand-Retail Members actively consuming PCCUs.** Ahead of making a Program Outcome Statement, members must have publicly communicated their participation. See example statements and guidance in Section E2.

B2.4 Consumer-facing statements: Statements intended to support customer (consumer) facing communication about the Trust Protocol and a member's participation in it through brand and retailer marketing and social media channels. **These statements can only be used by Brand-Retail Members actively consuming PCCUs.** Ahead of making a customer facing statement, members must have made public-facing statements communicating their membership and participation in the Trust Protocol. See example statements and guidance in Section E3.

B3. Consumption Claims

Consumption claims may be used by Trust Protocol members that record all *eligible material* transactions in the PCMS, as outlined in the **Chain of Custody Requirements**. Consumption claims require consumption of PCCUs.

Claim type	Description of claim	Only Brand & Retail members consuming PCCUs
Consumption claims	Claims that communicate a member's specific volume of Tracked U.S. Cotton and/or Protocol Cotton fiber, consumed in any given time period.	✓
On-product claims: Tracked U.S. Cotton or Protocol Cotton	Claims attached physically, visually or by inference to an individual finished product and communicated via consumer-facing channels. See additional requirements for Tracked U.S. Cotton in Section E4. See additional requirements for Protocol Cotton in Section E5.	✓
Use of assigned environmental metrics	Use of proportionately assigned environmental metrics to support or contribute to relevant corporate reporting. See requirements for use of *assigned environmental metrics* in Section E6.	✓

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B3.1 Consumption claims: Claims that communicate a member's specific volume of Tracked U.S. Cotton and/or Protocol Cotton fiber, consumed via PCCUs in any given time period.

a. Consumption claims shall align with the Trust Protocol **Chain of Custody Requirements**.

b. Consumption claims are available to Brand-Retail Members and are subject to a review and approval by Trust Protocol program managers.

B3.2 On-product claims are consumption claims attached physically, visually or by inference to an individual finished product and communicated via consumer-facing channels.

a. In order to ensure the credibility and protect the reputations of both the Brand-Retailer Members and the Trust Protocol, these claims will be subject to more stringent prior approvals than all other claims.

b. On-Product Claims can fall within two (2) distinct categories:

    • **On-Product Program Participation Statements:** defined as statements that communicate to consumers the Brand- Retailers' participation, support and commitment to the Trust Protocol program.

    • **On-Product Content Claims:** defined as claims that look to communicate consumption of Tracked U.S. Cotton or Protocol Cotton fiber within specific products.

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Section C: Claims Approval and Labeling Guidelines

C1. Claims Approval Process

C1.1 Members are required to notify the Trust Protocol of their intention to make public participation statements and claims using the 'marketing claims' function in the PCMS system. The request should detail:

   a. The nature of the claim, working within the guidance of this framework

   b. When the claim will be used

   c. Where the claim will be used – marketing or communication setting, intended audience, geographical reach, connection to any communications campaign

   d. Any requested variation to the Claims Framework guidance, if applicable, and associated need/rationale

C1.2 Trust Protocol staff will aim to respond to claims approval requests within five working days and reserves the right to:

   a. Reject claims that do not align to the guidance and program principles

   b. Make spot checks to ensure claims are executed as planned

   c. Withdraw approval of claims at any time, in order to protect program and organizational reputation.

C1.3 Approved claims will receive an approved claims reference number which should be quoted by the applicant.

C2. Use of Claims: Member Responsibilities

C2.1 Legal due diligence: As a condition of membership and use of the PCMS, members must follow all applicable laws, including but not necessarily limited to any representations and claims they make concerning their membership and their use of Tracked U.S. Cotton and/or Protocol Cotton fiber.

   a. The Trust Protocol does not provide legal advice or counsel to Members concerning their compliance with applicable law in the jurisdictions in which they operate.

   b. This Claims Framework is not intended to serve as nor should be relied upon as providing legal advice or guidance.

   c. Members must apply their own due diligence in ensuring that any Claims they make comply with all applicable laws in their particular markets, and in the context in which they want to use them and remain compliant following language translation.

NOTE: The Trust Protocol does not link the source of any particular volume of Tracked U.S. Cotton or Protocol Cotton to a Trust Protocol participating farm. Members should not represent or otherwise imply that the physical cotton in a product has come from a specific Trust Protocol farm.

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C2.2 Regulatory due diligence: Members making claims are responsible for verifying that such claims satisfy all applicable laws, including the marketing and labeling laws of the country(ies) in which the relevant products will be available for use or sale.

Examples of relevant guidance include (but are not limited to):

International:

- ISO 14020, ISO 14021, ISO 14024, ISO 14025

United States:

- Federal Trade Commission's, 16CFR Part 260, "Guides for the Use of Environmental Marketing Claims (Green Guides)", 2012

- Federal Trade Commission, 16CFR Part 255, "Guides Concerning the Use of Endorsements and Testimonials n Advertising," 2020

Europe:

- U.S. Textile Fiber Products Identification Act EU

- Guidance on the application of the Unfair Commercial Practices Directive (environmental claims), 2017

- Regulation 1007/2011 on Textile names and related marking of the fiber composition of textile goods

- EU Green Claims Directive

- EU Empowering Consumers for the Green Transition Directive

UK:

- Green Claims Code, 2021

- The Green Claims Code Fashion Compliance Guide 2024

- The Textile Products (Labelling and Fiber Composition) Regulations 2012

Canada:

- 2024 amendments to the Competition Act (deceptive marketing provisions)

C2.3 Use of Trust Protocol program data: Brand-Retailer Members must adhere to program requirements as relates to any use of program data. At no time shall a Brand-Retailer Member communicate that overall program data is representative of their specific actions, fiber consumption, or membership in the Trust Protocol.

C2.4 Avoiding misleading claims: By adhering to the claims approval process, Members are better equipped to make sound Claims about the Trust Protocol program and any associated environmental or other outcomes.

a. Claims should not be disproportionate to Member use of Tracked U.S. Cotton, Protocol Cotton, or participation in the program.

b. Any member observing an inappropriate representation of the Trust Protocol in the public domain is encouraged to report it to the Protocol program managers.

c. Upon discovery of a false claim being made in the public domain, members are obliged to notify Protocol program managers. Further guidance and support to members is available from Protocol program managers on how to address an identified or suspected false claim.

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C3. Integrity of Claims: Trust Protocol Responsibilities

C3.1 Right to withdraw: The U.S. Cotton Trust Protocol reserves the right to refuse approval, or to withdraw approval that has already been given, for any Claim relating to the program, at any time, in order to protect the program from misrepresentation, misleading or inaccurate claims.

C3.2 Claims monitoring and surveillance: The Trust Protocol will monitor the use of member claims in the public domain.

    a. False or misleading claims that violate the Protocol's Code of Conduct and, depending on the circumstances of the violation, could result in termination of a member's Trust Protocol membership.

    b. A violation of any applicable laws may also warrant termination of membership.

C3.3 False claims: The Trust Protocol reserves the right to request offending organizations to remove claims, take corrective action, and/or to pursue legal action against any organization who engages in non-compliant claims.

C3.4 Period of validity: Member claims approved in the PCMS will be valid for a maximum period of one year, after which they must be resubmitted for approval if still required.

C4. Labeling Guidelines: Branding and Logo

The Trust Protocol has created a public facing identity for use by its members. It enables program-level visual identification and product specific claims.

Public facing identity for members:

Features:

    a. Allows for instant recall and application across digital and physical spaces.

    b. Leaves of the cotton boll now also resemble a check mark. This leaf shape stamps our cotton boll with a symbol of verification.

    c. Members can also request approval of their own colors (neon green and blue shown above as examples).

Examples:

A branding and logo summary is included here, please refer to the Trust Protocol Member Toolkit provided to all members for full detail.

Section D: General Participation Statements

This section outlines corporate statements, which are not intended for use in customer-facing communications.

D1. General Statements about U.S. Cotton

These statements are intended to support members and stakeholders in describing or making reference to Tracked U.S. Cotton as validated within the PCMS, to add context to communications about the Trust Protocol program when making corporate statements.

D1.1 Example statements:

a. 'Cotton grown in the U.S. uses innovative seed varieties scientifically developed for increased efficiency, amongst other aspects that contribute to sustainable agriculture and climate resilience.'

b. 'U.S. cotton has a 35-year history of improving environmental impacts. Reductions in impacts in the U.S. are driven by adoption of precision agriculture technology and advanced analytics that improve yield and fiber quality. Further adoption of technology and best practices will continue to improve cotton production and help meet the 10-year sustainability goals.'

c. 'U.S. cotton production is governed by a strict national regulatory system. Environmental and workplace regulations are enforced by federal and state agencies, and the penalties for non-compliance are both civil and criminal.'

d. 'Every bale of U.S. Cotton has its own Permanent Bale Identification (PBI) tag. As each bale goes through the ginning and classing process, this tag goes along with it, enabling the tracking of where, when and how it was harvested, ginned and classed. The latest computer classing technology is used to make sure every bale of U.S. Cotton is fairly and correctly classed, ensuring uniformity and consistency within classes.'

D1.2 Refer to further public sources of information on:

a. U.S. cotton and on worker well-being.

b. U.S. Cotton production in the Field to Market: Alliance for Sustainable Agriculture National Indicators Report.

D2. Statements about the Trust Protocol Program

D2.1 Describing the program: These example statements are intended to support members and stakeholders in describing or making reference to the Trust Protocol program.

a. 'The U.S. Cotton Trust Protocol is the only sustainable cotton fiber program to bring quantifiable and verifiable measurement to U.S. cotton production and drive continuous improvement in six key sustainability metrics.'

b. 'Trust Protocol farmers are committed to continuously improving their environmental footprint, including water usage, soil diversity and greenhouse gas emissions.'

c. 'The Trust Protocol promotes that growers adopt a range of practices that support regenerative principles, including conservation tillage, application of cover crops, and crop rotation. Together, these practices improve soil health, reduce soil loss, and increase biodiversity.'

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d.   'The U.S. Cotton Trust Protocol, through its PCMS solution, tracks the consumption of U.S. Cotton fiber and Protocol Cotton fiber throughout the supply chain for member brands, from yarn spinning to finished goods. Starting with the authentication of the origin of the cotton fiber, supply chain transactions are assured through a double verification process.'

e.   'The U.S. Cotton Trust Protocol delivers full supply-chain transparency – from origin-authenticated U.S. cotton bales to finished products - by recording article-level transaction and production data directly from each organization involved in the complete production process.'

f.   'Launched in 2020, the U.S. Cotton Trust Protocol is a farm level, science-based program recognized by Textile Exchange as a source of preferred fiber that supports the Cotton 2025 Sustainable Cotton Challenge.'

g.   'The program has also been recognized and published in the ITC Standards Map, accepted as an ISEAL Community Member, and approved as a standard for sustainable cotton by Siegelklarheit, an initiative of the German Federal Government.'

D2.2 Describing the Trust Protocol Farming Practices: These example statements describe the farming practices that support positive environmental outcomes in line with the Trust Protocol environmental indicators.

a.   'Trust Protocol farmers deploy a range of farm management practices shown to reduce **greenhouse gas emissions** including reduced tillage, reduced use of plant nutrients, energy efficient harvesting and drying, and conservation agriculture.'

b.   'Trust Protocol farmers deploy a range of farm management practices shown to improve **energy efficiency** across a range of activities including crop applications, irrigation, drying and transportation.'

c.   'The Trust Protocol helps farmers to increase **water-use efficiency** by providing evidence-based analysis on how their local conditions and farm management practices are affecting water use. By promoting water-use efficiency opportunities relevant to the specific seed type, climate conditions, economic conditions, and regional water management rules enables growers to prioritize the practices that will have the greatest impact on increasing their water use efficiency.'

d.   'The Trust Protocol supports farmers to enhance **soil conservation** by providing evidence-based analysis on soil health opportunities relevant to the specific crop type, soil type, crop applications, irrigation system and local climate conditions. Farmers are able to prioritize the practices that will have the greatest impact on reducing soil loss and preserving soil biodiversity.'

e.   'The Trust Protocol supports farmers to increase **soil carbon**, an important indicator linked to water filtration, water and nutrient holding, crop productivity and carbon storage. Providing evidence-based analysis on the grower's adoption of conservation practices, use of cover crops, tillage and crop rotation, and the resulting impact on soil carbon, all contribute to the farmer's ability to improve soil carbon year on year.'

f.   'The Trust Protocol supports farmers to maximize **land use efficiency**, ensuring the greatest production output (or yield) on the mini- mum area of land. Providing evidence-based analysis on the factors contributing to yield, including plant genetics, crop management practices and environmental factors like temperature, radiation, humidity, water availability all support the grower in making decisions that enhance their land use efficiency.'

g.   'Trust Protocol growers adopt a range of practices that support **regenerative principles**, including conservation tillage, application of cover crops, and crop rotation. Together, these practices improve soil health, reduce soil loss and increase biodiversity.'

h. 'Worker health and safety are priorities for the U.S. cotton industry and the Trust Protocol contains robust criteria for **labor practices** supported by a grower questionnaire on worker rights and well-being. Areas of focus include fair labor and child labor as well as safety and hygiene.'

D2.3 Describing the Trust Protocol approach to regenerative agriculture: These example statements describe the farming practices that Trust Protocol growers can demonstrate in support of regenerative outcomes. These statements may only be used to describe the Trust Protocol program, and do not imply a claim of member action.

a. 'The Trust Protocol encourages practices such as reduced tillage and no-tillage that **minimize soil disturbance** and promote continuous ground cover through cover crops. These actions foster a living soil teeming with microbes, improve water retention, and reduce erosion. This approach is fundamental to regenerative agriculture, as it promotes healthy soil structure, improves nutrient cycling, and enhances overall soil health.'

b. 'The Trust Protocol also encourages practices that prevent soil erosion by maintaining a **continuous cover of plants** or crop residue on the ground. This aligns with regenerative principles, as cover crops help to retain valuable topsoil, improve water infiltration, and create a more resilient ecosystem.'

c. 'The Trust Protocol promotes the use of **Integrated Pest Management** (IPM) strategies. IPM focuses on identifying and managing pests in a holistic way, minimizing reliance on chemical control. This approach aligns with regenerative principles by fostering a healthy ecosystem that promotes natural pest control mechanisms and reduces the need for crop protection product interventions.'

d. 'The Trust Protocol supports the use of the 4R **Nutrient Management** principles: right source, right rate, right time, and right place. This ensures nutrients are applied efficiently, reducing environmental impact, and promoting responsible resource management which is a cornerstone of regenerative agriculture.'

e. 'The Trust Protocol recognizes the importance of **biodiversity** for a healthy ecosystem and encourage practices that create suitable habitats for a variety of native species. This aligns with regenerative principles, as fostering biodiversity contributes to a more balanced and resilient ecosystem, promoting long-term sustainability.'

D2.4 Additional resources: Visit our website for further resources on the program detail, including principles & criteria for farmers.

Section E: Guidance: Communication of Claims

This section outlines examples of allowed communications for the statements and claims outlined in Section B.

E1. Allowed Member Participation Statements

Member Participation Statements are outlined in Section B2. These example statements are specific to membership categories and are intended to support members in communicating their participation in, and commitment to, the program.

E1.1 Brands and Retailers

a. 'At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol, a program that aims to contribute to a more sustainable and transparent world, by measuring outcomes and impact as well as driving innovation in U.S. Cotton production.'

b. 'At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol, a program that measures outcomes and improves impact.'

c. 'At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol as part of our commitment to sustainability.'

Optional supporting statements available in section E.2.6.

E1.2 Brands and Retailers Consuming PCCUs

a. 'At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol, a program that aims to contribute to a more sustainable and transparent world, by measuring outcomes and impact as well as driving innovation in U.S. Cotton production.'

b. 'At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol, a program that measures outcomes and improves impact.'

c. 'At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol, the only cotton fiber program to provide field-level environmental data as well as traceability and transparency in the supply chain.'

d. '[Name] is committed to tracking [X] % (or Y tons) of our cotton through the U.S. Cotton Trust Protocol by [date] as part of our commitment to improving our environmental footprint and the transparency of our supply chain.'

e. '[Name] is committed to tracking [X % or Y tons] of our cotton through the U.S. Cotton Trust Protocol, a program that enables us to source (more) sustainably grown cotton and better understand our environmental footprint.'

f. '[Name] has achieved article-level transparency across the supply chain for U.S. Cotton through the use of the U.S. Cotton Trust Protocol's digitally-enabled Protocol Consumption Management Solution (PCMS).'

g. 'By consuming U.S. Cotton, as tracked through the U.S. Cotton Trust Protocol program [Name] is building transparency of our value chain from fiber source to finished products, ensuring visibility of all suppliers participating in the complete production process of our products.

h. 'By consuming Protocol Cotton*, as tracked through the U.S. Cotton Trust Protocol program [Name] is building transparency of our value chain from fiber produced by Trust Protocol farms to finished products, as well as supporting Trust Protocol growers' efforts towards improving their environmental footprint.'

*Protocol Cotton may only be used when describing cotton fiber physically originating from Protocol Farms

E1.3 Mills and Manufacturers

a. 'As a member of the U.S. Cotton Trust Protocol [Name] is committed to help drive positive change in sustainable cotton sourcing by building full transparency of our cotton supply chain and supporting best practice in U.S. cotton production.'

b. 'At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol, a program that aims to contribute to a more sustainable and transparent world, by measuring outcomes and impact as well as driving innovation in U.S. Cotton production.'

E1.4 Aggregators

a. 'Through the U.S. Cotton Trust Protocol, [NAME] can secure a stable supply of responsibly grown cotton to support the fashion and textile industries in meeting their corporate environmental and social responsibility goals.'

b. 'As Aggregators, [NAME] encourages our growers to partner with us in the U.S. Cotton Trust Protocol and the journey to continuous improvement. By adopting the U.S. Cotton Trust Protocol principles, growers are committing to using environmentally and socially responsible practices.'

E1.5 Farmers

a. 'As farmers we know how important sustainability is in cotton production, and the U.S. Cotton Trust Protocol is providing growers like me the opportunity to share with consumers, brands and retailers how we grow cotton using environmentally and socially responsible practices.'

b. 'I am proud to be among the growers to commit to the U.S. Cotton Trust Protocol, which enables us to measure outcomes and drive innovation in U.S. cotton production. I am using the tools and insights provided by the Trust Protocol to ensure our farm is able to track the outcomes of using sustainable practices to improve both our environmental footprint and business resilience.'

c. 'With the U.S. Cotton Trust Protocol I can record, track and verify our farming system is continuously improving while seeking progressive approaches to improve on our efforts in environmentally and socially responsible practices.'

d. 'Like other U.S. Cotton Trust Protocol farmers, I am applying a range of practices across my farm to ensure my crop is grown responsibly, for instance rotating cotton with other crops, in order to improve my environmental footprint.'

E1.6 Supporters

Any members not participating in the Trust Protocol value chain, including donors, foundations, investors, non-consuming brands.

a. '[Name], is a proud supporter of the U.S. Cotton Trust Protocol, a program that aims to contribute to a more sustainable and transparent world, by measuring outcomes and impact as well as driving innovation in U.S. Cotton production.'

b. '[Name], is a proud supporter of the U.S. Cotton Trust Protocol, a program that measures outcomes and improves impact.'

c. '[Name], as a supporter of the U.S. Cotton Trust Protocol, is committed to a program that is helping farmers adopt the principles and continuous improvement practices of the Trust Protocol to increase soil health and carbon storage, increase biodiversity, and reduce greenhouse gas emissions.'

E2. Allowed Program Outcome Statements

Program Outcome Statements are outlined in Section B2. Program Outcome Statements are intended to be used to describe the overall program achievements and to reference progress of specific environmental metrics and improvements towards environmental goals.

E2.1 Making a program outcome statement associates a member's participation with program outcomes, either in aggregate or in fiber volume-based form, and can only be used by Brand-Retail members actively consuming PCCUs.

E2.2 Ahead of making a program outcome statement, members must have publicly communicated their participation. See participation statements described in Section B2 of this document.

These statements are available to Brand & Retailer members claiming PCCUs.

Trust Protocol Annual Report: Information on latest program results

The Trust Protocol Annual Report is published to Trust Protocol Members, with aggregated program results available to all members and additional impact insights provided to Brand- Retailer members consuming PCCUs. The report details data collection and analysis, the baseline or reference point for comparison, and detailed explanation of the results. The public report can be found here.

Member specific volumes of assigned environmental metrics are available through the PCMS brand dashboard, updated when the available PCCUs are drawn down from the Protocol Bank to be used by the consuming brand to build a statement in accordance with this guidance. Please refer to the guidance in Section E6 on using environmental metric data.

E.2.4 Example program statements, based on aggregate data:

a. 'In [year] a total of [number] farmers participated in the U.S. Cotton Trust Protocol, delivering [X tons or Ym bales] of Protocol Cotton fiber to market, which is [Z%] of total U.S. cotton production.'

b. 'In [year] Trust Protocol cotton production of [number] acres representing [number]% of the crop used conservation tillage practices, directly improving soil health by reducing net soil loss and increasing soil organic matter.'

c. 'In [year] Trust Protocol cotton production of [number] acres representing [number]% of the crop, planted cover crops, maintaining living roots in the ground and protecting the soil.'

d. 'In [year] Trust Protocol cotton production of [number] acres representing [number]% of the crop implemented crop rotation, helping to improve soil biodiversity with an increase in soil carbon storage because of the presence of diverse soil microbial groups.'

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e. 'As a member of the U.S. Cotton Trust Protocol, which aims to set a new standard in more sustainable cotton production, we are proud that farmers in the [year] program achieved an aggregate;

- A % water efficiency improvement
- B % GHG emissions reduction
- C % energy use reduction
- D % soil conservation improvement
- E % land use efficiency improvement

Compared to a 2015 representative group[1]

f. Since 2020 the Trust Protocol program has seen a trend towards improvement in these metrics driven by the efforts made by Trust Protocol grower members.

- A % water efficiency improvement
- B % GHG emissions reduction
- C % energy use reduction
- D % soil conservation improvement
- E % land use efficiency improvement

E.2.5 Trends claims demonstrate that the sustainability metric results generated by the program are showing directional improvement. This claim provides an interim path to highlight a project's progress before reaching the five years of data required for an Impact claim.

E.2.5.1 Example consumption claims. Consumption (volume) claims should have appropriate context applied alongside, relating the statement to the Member's material sustainability impacts, targets and progress.

a. [NAME] consumed [data point] tons of U.S. Cotton in [year], tracked through our supply chain by the U.S. Cotton Trust Protocol.

b. [NAME] consumed [data point] tons of Protocol Cotton* in [year], tracked through our supply chain by the U.S. Cotton Trust Protocol.

c. [NAME] consumed [data point] tons of U.S. Cotton in [year], tracked through our supply chain by the U.S. Cotton Trust Protocol. Of this volume, [data point] originated from Protocol Farms.

*Protocol Cotton may only be used when describing cotton fiber physically originating from Protocol Farms.

1 Refer to most recent Annual Report for full detail on the baseline

E.2.6 Supporting statements. These statements maybe used alongside Trust Protocol claims, to provide greater detail to the audience.

a. 'With the U.S. Cotton Trust Protocol, which integrates sustainability metrics from Field to Market's Fieldprint® Platform, we are now able to monitor and track on-farm improvements and inform our understanding of a range of cotton production metrics, including greenhouse gas emissions. The U.S. cotton industry aims to reduce greenhouse gases for each kilogram of cotton by 39% by 2025, versus a 2015 representative group, which is aligned with [NAME's] (goals/ targets/SBTs) to reduce emissions by [X% by 20XX].'

b. 'With the U.S. Cotton Trust Protocol, and sustainability metrics from Field to Market's Fieldprint® Platform, we now have year-on- year data to show progress across several cotton production metrics, including energy use. The Trust Protocol measures the U.S. cotton industry's efforts to reduce the energy used to produce each kilogram of U.S. cotton by 15% by 2025, which supports [NAME]'s target to reduce energy usage by [insert goal].'

c. 'Continuous improvement of our water footprint is important to [NAME], which is why we have decided to source more sustainable fiber through the U.S. Cotton Trust Protocol. Water is a precious resource and Trust Protocol farmers use precision irrigation techniques to minimize the amount of water used. The Trust Protocol supports efforts to reduce the water used to grow each bale of U.S. cotton by 18% by 2025 versus a 2015 representative group and verifies U.S. cotton's sustainability progress through yearly data tracking.'

d. 'Protecting the soil for future generations is important to [NAME]. Conserving soil is a critical element of sustainable agriculture, helping to improve water ecosystems and biodiversity. On a yearly basis, Protocol growers document and monitor their growing practices through integration of sustainability metrics from Field to Market's Fieldprint® Platform. [NAME] is proud to support Protocol farmers in their efforts to improve soil health and their ambitious goal of 50% reduction in soil erosion – meaning no net soil loss by 2025.'

e. 'Cotton is a key raw material for [NAME] which is why we have decided to source more sustainable fiber through the U.S. Cotton Trust Protocol. The Trust Protocol tracks the practices that Protocol cotton growers use to increase the amount of carbon stored in the soil. Increased soil carbon leads to healthier soil and less carbon dioxide in the atmosphere, and can help to reduce global climate change. The Trust Protocol program integrates sustainability metrics from Field to Market's Fieldprint® Platform to provide us with important annualized data on soil carbon and other metrics that align with our commitments towards continuous climate impact improvements.'

f. 'Efficient land use is a priority for [NAME], which is why we are sourcing cotton through the U.S. Cotton Trust Protocol. As part of our more sustainable fiber sourcing strategy we are supporting U.S. cotton farmers in their work to reduce the land needed to produce a bale of cotton by 13% by 2025.'

g. 'At [NAME] we recognize the importance of adopting regenerative practices in agriculture. By participating in the Trust Protocol, we are learning from U.S. cotton farmers and their work to adopt a range of practices that support regenerative principles.'

E3. Consumer-Facing Statements and Claims

Customer-facing claims are those intended to support customer (consumer- facing) communication about the Trust Protocol and a member's participation in it through brand and retailer marketing and social media channels. These claims may only be used by Brand-Retail members actively consuming PCCUs.

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E.3.1 Ahead of making a customer facing claim, members must have publicly communicated their participation. See 'participation statements' (Section B2.2 and Section E1).

E.3.2 Example statements available to all Brand & Retailer members:

a. 'At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol, a program that aims to contribute to a more sustainable and transparent world, measuring outcomes and driving innovation in U.S. Cotton production.'

b. 'At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol, a program that enables us to contribute to a more sustainable and transparent world.'

c. 'At [Name], we're proud to be a member of the U.S. Cotton Trust Protocol, a program that measures outcomes and improves impact.'

d. 'At <brand>, we're proud to be a member of the U.S. Cotton Trust Protocol as part of our commitment to sustainability.'

e. 'At <brand>, we're proud to be a member of the U.S. Cotton Trust Protocol as part of our commitment to sustainability, traceability and transparency in our supply chain.'

f. 'At <brand>, we're proud to be a member of the U.S. Cotton Trust Protocol, the only cotton fiber program to provide verified field-level environmental data as well as traceability and transparency in the supply chain.'

g. 'At <brand>, we're proud to be a member of the U.S. Cotton Trust Protocol, a program which assures that the cotton in our products is responsibly sourced from the USA.'

To support customers in understanding the Trust Protocol, it is good practice to include the available QR code, a link or URL for them to follow for further information: consumer.trustuscotton.org. This option does not replace the need for clear and comprehensive claims statements.

E4. On-product claims for Tracked U.S. Cotton

E.4.1 These claims are intended to support consumer facing communication within a product description in the following formats:

a. e-commerce product page

b. POS in physical retail locations (stores)

c. hang tags or physical labels applied to product

d. sewn in or in-garment printing of labels

e. product packaging

E.4.2 On-product claims for Tracked U.S. Cotton that are not permitted:

a. Umbrella messaging to suggest that the product is sustainable or has been sustainably produced, unless otherwise evidenced

b. Generic terms such as 'eco cotton'

c. Statement or implication that the cotton can be traced to a specific farm

d. Reference to specific environmental metrics

These claims are available to Brand & Retailer members consuming PCCUs

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E.4.3 Product content claim criteria for Tracked U.S. Cotton:

Chain of Custody Model	Fiber content criteria	Permitted Content Claim	Stamp
Segregation	100% Tracked U.S. Cotton*	Made from U.S. Cotton or Made from 100% U.S. Cotton	[on product stamp for U.S. Cotton- to be provided by the Trust Protocol]
Controlled blending	>50% Tracked U.S. Cotton Remaining content from non-cotton fibers and/or certified recycled[2] cotton	Blended with (or contains) U.S. Cotton or Contains X% U.S. Cotton	[blended U.S. stamp- to be provided by the Trust Protocol]
The Protocol claim approval reference number must be applied alongside the above			

*excluding trims

E.4.4 Claims related to other provenance fibers blended with Tracked U.S. Cotton are governed by their respective industry standard or certification.

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E.4.5 Permitted on-product claims examples for Tracked U.S. Cotton

a. This product contains [X]% U.S. Cotton as verified by the Trust Protocol.

b. The cotton in this product is responsibly sourced from the USA, as verified by the Trust Protocol.

Product content claims can be supported by general marketing and participation statements set out in this document as well as representative farmer stories by request.

E.4.6 Please submit any new designs via the PCMS member dashboard to the Trust Protocol for approval.

E5. On-product Claims for Protocol Cotton

E.5.1 These Protocol Cotton claims are intended to support consumer facing communication within a product description in the following formats:

a. e-commerce product page

b. POS in physical retail locations (stores)

c. hang tags or physical labels applied to product

d. sew in or in-garment printing of labels

e. product packaging

E.5.2 On-product claims for Protocol Cotton that are not permitted:

a. Umbrella messaging to suggest that the product is sustainable or has been sustainably produced, unless otherwise evidenced

b. Generic terms such as 'eco cotton'

c. Statement or implication that the cotton can be traced to a specific farm

d. Reference to specific environmental metrics

These claims are available to Brand & Retailer members consuming Protocol Cotton, tracked through the PCMS system as physically originating from Trust Protocol Farms.

E.5.3 Product content claim criteria for Protocol Cotton:

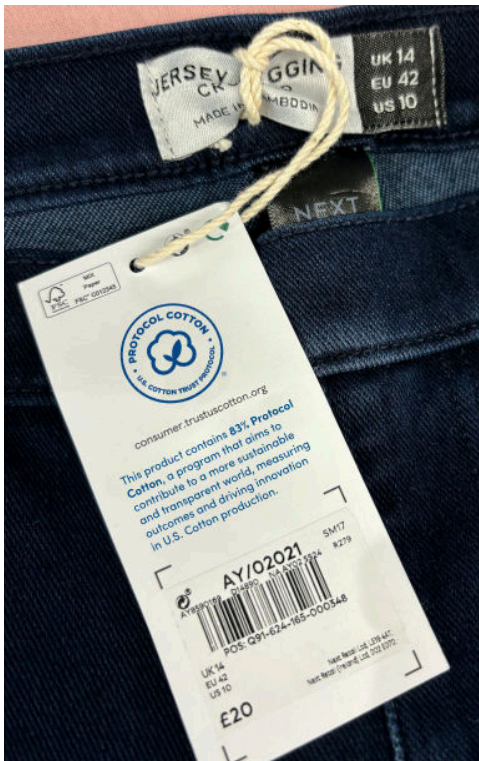| Chain of Custody Model	Fiber content criteria	Permitted Content Claim	Stamp
Segregation	100% tracked Protocol Cotton*	Made from Protocol Cotton or 100% Protocol Cotton	[On-product stamp for Protocol Cotton- to be provided by the Trust Protocol]
Controlled blending	>50% tracked Protocol Cotton Remaining content from Tracked U.S. Cotton, non-cotton fibers and/or certified recycled[3] cotton	Blended with (or contains) Protocol Cotton or Contains X% Protocol Cotton	[blended Protocol stamp]
The Protocol claim approval reference number must be applied alongside the above			

*excluding trims

E.5.4 Claims related to other provenance fibers blended with Tracked U.S. Cotton are governed by their respective industry standard or certification.

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3 Recycled cotton, separately certified under schemes that are recognized by Textile Exchange (GRS, RCS)

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E.5.5 Permitted on-product claims examples for Protocol Cotton:

a. This product contains [X]% Protocol Cotton, a program that aims to contribute to a more sustainable and transparent world, measuring outcomes and driving innovation in U.S. Cotton production.

b. This product contains [X]% Protocol Cotton, from farmers in the U.S. committed to continuously improving their environmental footprint, including water usage, soil diversity and greenhouse gas emissions.

Product content claims can be supported by general marketing and participation statements set out in this document as well as representative farmer stories by request.

E.5.6 Please submit any new designs via the PCMS member dashboard to the Trust Protocol for approval.

E6. Use of Assigned Environmental Metrics

E.6.1 Trust Protocol data is designed to help Members meet their sustainability goals. The data can be used for:

a. **Science-Based Targets for Nature (SBTN) Target Setting:** Trust Protocol metrics align with SBTN targets for freshwater, land, biodiversity, and climate, providing data for setting and tracking progress towards science-based goals.

b. **Corporate Sustainability Reporting Directive (CSRD) Benchmarking:** Trust Protocol data can be used to benchmark performance against CSRD requirements, demonstrating transparency and accountability in sustainability reporting.

c. **Scope 3 Reporting:** Trust Protocol provides data on emissions from cotton cultivation, enabling brands to accurately report their Scope 3 GHG emissions and track progress towards reduction targets.

E.6.2 Brand-Retail Members consuming PCCUs may use program data in accordance with the guidance set out below:

a. **Absolute values:** Brand-Retail Members consuming PCCUs may use the absolute values of their verified consumption and proportionately assigned environmental metrics each year to support or contribute to relevant aggregate environmental footprint calculation, for example scope 3 carbon emissions tracking. Any direct application of Trust Protocol environmental metrics into a brand-retail member's raw material footprint calculation is carried out under the member's own responsibility and should follow appropriate GHG Protocol or SBTi guidance.

   - In line with current GHG Accounting Protocol, Trust Protocol aggregate program emissions factors can be applied as primary data in the case of Protocol Cotton consumption, and as secondary data in the case of Tracked U.S. Cotton consumption.

   - These numbers are intended to provide business relevant insight and may not be reported outwardly in the form of a claim statement specific to cotton consumed through the program. This does not preclude members from including the data within a combined calculation for external reporting, for example 'all raw materials' or 'scope 3 total.'

b. **Product Footprint Calculation:** Brand-Retail Members consuming PCCUs may use Trust Protocol datasets available through approved material or product foot printing tools, such as the Worldly Higg Product Tools.

   - Trust Protocol aggregated program metrics may be used as Lifecycle impact assessment (LCIA) equivalent data to represent the raw material footprint of Tracked U.S. Cotton fiber consumed through the Trust Protocol program. The expected use case is for Trust Protocol Member Brands (the 'user') to be able to model product environmental impacts using their own- or third-party foot printing tools, applying Protocol program data to their use of Protocol Cotton or Tracked U.S. Cotton.

   - By prior agreement, 3rd party environmental modeling tools and platforms may use the Trust Protocol program metrics to model or calculate the footprint of textile materials or finished products where the 'user' is both a member of the U.S. Cotton Trust Protocol and has sourced and tracked eligible U.S. Cotton fiber into the finished product.

   - Third-party platforms shall share their methodology for data modeling with U.S. Cotton Trust Protocol in advance, such that both parties can align on data parameters and transformations, maintaining a truthful and consistent view of program data.

   - Product foot printing party platforms must demonstrate third-party certification of their methodology in line with the Greenhouse Gas Reporting Protocol, along with in house expertise in lifecycle assessment (LCA).

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Contact the Trust Protocol team for more information on the latest tools approved for Trust Protocol data use, or to request agreement for data use in a specific application.

> **Global goals: The U.S. Cotton Trust Protocol program supports the UN Sustainable Development Goals, read more about our contribution to the SDGs <u>here</u>.**

E.6.3 Use of assigned environmental metrics that is not allowed:

a. The Trust Protocol does not allow its environmental metric results to be used in comparative statements to past consumptions and associated environmental metric data from other sources/programs.

b. The Trust Protocol does not support comparative impact claims that do not follow the best available science and ISO LCA standards, to avoid inappropriate use of data or misleading sustainability statements.

c. Public communication referencing a comparison of Trust Protocol data to data from any other source, or asserting a comparative 'improvement' Claim is not permitted.

E.6.4 The Trust Protocol endeavors to maintain alignment with emerging and changing regulatory guidance surrounding sustainability communications and 'green claims', and commits to working closely with members to adapt as necessary.

E7. Brand-Retailer Transfer

E.7.1 Brands consuming PCCUs are able to transfer Trust Protocol traceability data alongside the transfer of related articles (finished products) to another brand or retail trading partner, supporting product related claims.

System capability supports partial automation, with anticipated enhancements to this functionality during 2025.

Separate guidance is available on 'how' to complete this transfer. Please contact your Trust Protocol account team for guidance on this process if it is relevant to your operation.

E.7.2 At this time, Brands can transfer the following:

a. PCCUs with accompanying environmental metric data

b. Accompanying product identification and volume data

E.7.3 Brands cannot currently transfer:

a. PCCU volumes / Environmental metric data already used in a public claim/report by initial brand

b. Traceability data

E.7.4 Prerequisites:

a. All parties must be Trust Protocol members

b. Products to be transferred must have already had PCCU claims executed and approved by a Trust Protocol Program Manager before transfer to recipient brand

c. All PCCUs to be transferred must have been recognized in the donor brand's PCMS dashboard

d. PCCUs may only be transferred when the associated goods/articles are also being traded

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Appendix A

A1. Quick reference guide to marketing claims

Please refer to the detail in this document for full guidance on creating an approved claim.

Type of claim:	Where the claim can be made:		
	Stakeholder-facing communication	Consumer-facing communication	On product*
Participation	✓ Permitted	✓ Permitted	✓ Permitted
Program outcomes	✓ Permitted	✓ Permitted	× Not permitted
Volume consumption of Tracked U.S. Cotton or Protocol Cotton	✓ Permitted	✓ Permitted	× Not permitted
Product content claim	✓ Permitted	✓ Permitted	✓ Permitted
Volume related environmental metrics	× Not permitted	× Not permitted	× Not permitted

*only where the product contains Tracked U.S. Cotton or Protocol Cotton, meeting the criteria defined in the 'on product claims' rules.

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A2. Process overview

Trust Protocol members should request and manage marketing claims online, through the PCMS dashboard. This provides tracking and archiving of agreed language and associated documents/assets, as well as ensuring a timely response from the Trust Protocol reviewing team.

1
Claim
request created

2
Claim
submitted

3
Claim
review

REJECTED

APPROVED

**Revisions
requested**

4
Approved Claim
number issued

Claim
revised

5
PCCUs consumed
(if applicable)

6
Claim
in active use

Claim
monitoring

● Member

● Trust Protocol

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