

Crate&Barrel



Crate
&kids

QUALITY AND COMPLIANCE MANUAL

CBH QUALITY AND COMPLIANCE MANUAL

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Section 1: General Information

1.1 Purpose

Crate and Barrel Holdings Inc. (CBH) is dedicated to providing customers with exceptional products. CBH established the Quality and Compliance Program to monitor and ensure compliance with applicable laws, regulations and corporate quality standards. It is the intention of CBH to provide foundational guidelines to its vendors with the expectation that they are committed to delivering products that meet CBH requirements. CBH reserves the right to adjust and apply requirements as business warrants.

Please note that this program is not intended to replace the vendor's own quality assurance processes, nor is it meant to be a substitute for the vendors' responsibility to monitor and supply safe, compliant product.

You are subject to the latest version of this manual for the duration of your business relationship with CBH.

1.2 Applies To

This Quality and Compliance Program applies to all vendors of private brand and non-national brand products as defined by CBH, regardless of origin. Additionally, any brand product that is a direct import, wherein CBH is the Importer of Record (IOR), is required to comply with the program. A Private Brand is defined as any product manufactured uniquely for CBH. A vendor is defined as any manufacturer, factory, agent, or party that provides product and/or material to CBH. For all vendors (regardless of origin), Franchise testing may be required as requested by the Quality and Compliance team - see section 2.9.

1.3 Timeline

It is the vendors' responsibility to work within the associated timelines to ensure timely application of the Quality and Compliance Program.

1.4 CBH Product Testing Program

All products supplied to CBH must comply with all applicable laws, regulations, guidelines and rules, as well as with CBH quality standards. If a product does not meet these requirements, the vendor must notify the CBH Quality and Compliance team as soon as the vendor is aware of such noncompliance. It is the absolute right of CBH, among other things, to cancel or return

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any noncompliant order(s) or products at the expense of the vendor without financial impact to CBH.

It is the vendor's responsibility to work directly with CBH's designated third party testing laboratories to submit all necessary online forms, including any applicable supplemental documents, and successfully complete testing requirements within the required timeline to meet business obligations and shipping schedules. Please note that the vendor is responsible for obtaining CBH testing protocols from the nominated third party labs.

Quality standards have been developed for CBH products. Laboratory evaluations, in accordance with such standards, are comprehensive and will include packaging, labeling, product performance, quality evaluation, and regulatory compliance. All CBH protocols are available on each lab's website. (reference section 1.5 for direct link).

All product ordered under the Crate&Kids brand is considered children's product and as such must be tested and labeled according to children's product requirements.

1.5 Nominated Lab Partners

CBH has elected Bureau Veritas (BV) and Intertek (ITS) as the approved testing partners for our Quality and Compliance Program. By working with these select CPSC accredited test labs, CBH is able to secure preferential pricing and automatically gather information for reporting purposes. Testing requested by CBH must be completed by either BV or ITS. Any exceptions must be agreed to in advance in writing with the CBH Quality and Compliance team. If there are any issues with lab location or availability of testing labs, please reach out to the Quality and Compliance team for assistance.

Please contact the local lab representative for the access information. Note that lab login information can periodically change. Information about CBH testing protocols can be accessed through the following links:

Bureau Veritas (BV) <https://docushare.cps.bureauveritas.com/docushare/dsweb/HomePage>

Intertek (ITS) <https://ims.intertek.com>

Section 2: Testing Procedures

2.1 Corporate Company Policy

The CBH testing program is composed of the product development, initial product, and periodic product testing described below. The CBH testing program addresses all the reasonable testing product requirements required by the United States Consumer Product Safety Commission (CPSC), and includes additional requirements that are specific only to CBH.

2.2 Product Testing Costs / Obtaining Testing Costs

In order to provide adequate product quotes to the merchandising teams, vendors are advised to obtain testing quotes from the labs during product development. Please note that test labs can only provide accurate testing costs upon reviewing physical product samples, so it is advised to work with labs closely during product development. Quotes will not be released without physical samples.

2.3 Product Development Testing

During product development, vendors are advised to closely review their products against applicable testing protocols and to conduct developmental testing on product samples. Testing conducted during the product development phase can be both in-house (done by the vendor, sub contractor, or agent) or with a third party testing lab. By testing products during development, vendors can avoid testing failures and cost changes associated with the redesign of product, change in materials, and penalties associated with delay in production/shipment. Certain tests conducted during product development may be applied to full product testing. More information on this will be available when working with the CBH designated lab partners.

Any issues identified during product development testing that require a product design/material change, or affect the cost of the product must be reviewed with the CBH Merchandising/Sourcing team and the Quality and Regulatory teams before being implemented into the next round of product sampling.

2.4 Initial Product Testing

Vendors must submit and review their products with a local BV or ITS test lab to determine what applicable protocols, performance and quality requirements may apply to their items. Test results must be approved by a CBH Quality and Regulatory associate prior to first shipment. Only Quality and Compliance associates may waive testing or a non-regulatory test line failure; regulatory test line failures cannot be waived. For initial product testing, products must have a CBH approved test report for the requested quality and transit testing (if applicable) at least thirty (30) days prior to the ship date. Please allow time to correct failed test results. Please contact packaging-group@crateandbarrel.com for transit test information or questions.

Vendors must submit products along with test request forms (TRF), group testing forms (GTFs), and any other necessary documentation (such as flammability, FDA testing, etc.) to the test lab for lab review. The TRFs and GTFs are on-line forms that must be submitted electronically.

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For Labeling Only:

Vendors must always submit product with hard (print) or soft (electronic) copies of any required labeling (such as warning labels, fiber content, law labels, etc.) for a report to be issued. If no documentation is submitted, or documentation cannot be presented to the lab, the lab will automatically issue a failing report for lack of documentation. Font sizes should be noted on all soft copies for verification purposes. Any product that requires specific labeling (e.g. lamping labels, warning labels, upholstery and stuffed articles) should be submitted to the lab with all labeling attached to the product. If there is an instance where label information is generated during testing (e.g. burn time for candles, fiber content for textiles), then a soft or electronic copy of the label may be submitted in lieu of a printed label.

2.5 Periodic Testing

CBH requires vendors to regularly test products with third party labs as part of its periodic testing program. Periodic testing ensures that products continue to meet performance expectations and comply with applicable regulations. Test reports older than twelve (12) months from the date of issue are not considered valid and the product must be retested and have a new report issued. Products cannot ship with expired testing and must have a current test report on file at least thirty (30) days prior to the ship date. Vendors found shipping product without a valid CBH accepted test report may be subject to penalties.

Example: Crate and Barrel table is first tested in January 2018. The table is re-ordered for shipment in October 2018, and can ship without any re-testing as the first report is valid for twelve months. Another re-order is placed for shipment in March 2019. The March 2019 shipment *cannot* ship unless a new test report is generated as March 2019 is more than twelve months beyond the January 2018 test date.

Please see the below chart for additional information regarding what testing may be required at the time of reorder.

Testing Timeline		
Annual (regulatory requirements only)	Annual full protocol testing (including regulatory requirements)	Biannual full protocol testing (2 years)
All imported products with regulated requirements	High Risk Products	All imported Products

High risk products fall into the following categories:

- Children's products,
- Electrical products,

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- Candles and candle holders,
- Health and beauty products, and
- Imported food

For repeat product orders subject to periodic testing, any reordered products that do not have any material changes (see below for additional information) must be submitted annually for either regulatory only testing or full protocol testing.

Example: A CB2 decorative vase is tested in January 2018 and complies with all the decor requirements. The vase is reordered in February 2019. The vase is not considered a high risk product, so vendor only needs to re-test the vase against regulatory requirements only - in this case only Prop 65 testing. The vase is reordered again in March 2020. Since it has been two years since the vase was fully tested (January 2018), the vase must be tested to the full protocol.

Example: A Crate & Kids children's bedding set is tested in January 2018 and complies with all the children's bedding requirements. The bedding set is reordered in February 2019. A children's bedding set is considered high risk, so the vendor must retest the bedding set against the full protocol.

If there are any questions regarding a product that is considered high risk, please contact the Quality and Regulatory Compliance team for additional information. Note that the Quality and Regulatory Compliance team and/or the merchandising/sourcing team may request additional testing beyond the testing above.

2.6 Material Changes

A material change is a change that the vendor makes to their product's design, the manufacturing process, or the source of component parts for the product, which a vendor knows, or should know, could affect the product's ability to comply with the applicable product standards. *Factory changes are considered material changes.* Products that have had a material change are subject to immediate, new full protocol testing prior to any new production unless otherwise advised by Quality and Regulatory team. If a material change is planned for a product, a vendor must immediately inform Quality and Compliance team as well as the merchandising/sourcing team prior to implementing the material.

2.7 Group Testing

Group testing can be applied to product testing to avoid duplication, reduce testing expenses, and limit the numbers of required test samples. The extent of testing that can be grouped or shared between products will vary depending on the product and product characteristics. For example, certain traits where different color, construction, or functions would need to be tested on individual products and cannot be shared.

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The following criteria may qualify products for group testing. The lab is ultimately responsible for approval of group testing.

- Items must be made of the same materials (e.g. coatings, fiber content, substrates)
- Items must be made using the same processes
- Items must be made at the same factory
- Items must share similar functions
- Items must be submitted together in order to apply group testing

Examples of items that can be group tested:

- Towel collection with multiple sizes and multiple colorways
- Floral items with the same stem component, but multiple petal colorways
- Plastic beverage containers sharing the same drinking straw?
- A furniture collection sharing the same finishes and materials but different pieces

Group testing forms must be submitted with the TRF when requesting testing, and are subject to approval by CBH and/or the test lab. To obtain forms and pre-approval for group testing, contact your agent or CBH approved test lab. CBH or the test lab retains the right to reject group testing requests.

Example: a product collection consists of bath towels, hand towels, and washcloth. All materials are 100% cotton. All three products should be submitted together for evaluation. Lab will test certain lines across all pieces together (e.g. colorfastness, fiber analysis), whereas other lines will have to be tested individually (e.g. seam strength).

Example: a bed collection is offered in full, queen, king, but feature the same materials and hardware. Each size of bed must be submitted to the lab for evaluation. The lab will share certain test lines across all pieces (e.g. chemical content of coatings, colorfastness), however other test lines (e.g. physical product performance) will be applied individually.

2.8 Test Failures

In the event of a failure during product testing, results will be reviewed by the Quality and Compliance team. **Only a Quality and Regulatory Compliance associate may waive testing failures.** Prior to submitting an item for re-testing, a vendor must provide the Quality and Compliance team with a corrective action plan detailing the cause of failure and the resolution. The corrective action plan should also be included with the TRF to the lab at the time of retesting.

After re-testing, the Quality and Compliance team has the right to request a random product inspection and re-test the product to ensure that the product is fully compliant with CBH product requirements.

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Vendors found shipping product with a failing test report and without a Quality and Compliance waiver may be subject to penalties.

2.9 Franchise Testing Requirements

As CBH continues to expand the global footprint, the company must ensure that products meet the regulatory requirements of the applicable market. Requirements specific to the needs of our franchise partners will be built into the testing protocols. Vendors are responsible to ensure that their products meet all requirements for the markets where the products are sold.

Section 3: Product Inspections

3.1 Outbound Product Inspection Requirements

If you are working through one of our agents, our expectation is that the agent is monitoring production through During Production Inspection (DUPRO) and Final Random Inspection (FRI) prior to shipment. We will validate this through our inbound DC inspection process.

If you do not work through a CBH agent, you may be required to have a DUPRO and/or FRI prior to shipment by a third party inspection provider. The Quality and Compliance team will communicate this to the vendor in advance if this is required. The vendor will then be notified by the third party provider when the inspection is to take place. Goods may not ship until this inspection has been completed and approved by the Quality and Regulatory Compliance team. If the inspection fails, goods will need to be corrected prior to shipment per agreed upon CORRECTIVE ACTION PLAN between the vendor and CBH.

DUPRO is an inspection of key product characteristics during production. Inspections take place at the factory when 40 to 60% of the total purchase order quantity is produced. It covers completed products, and/or finished products and packaging.

If an item's production quantity is not at a minimum 40% produced, the inspection will be cancelled. A new, rescheduled inspection will be required. This applies to ALL items during a multiple item inspection. Detailed inspection requirements can be obtained from the CBH approved lab partner. A DUPRO will be performed upon request from CBH, at the vendor's expense. If sample collection testing is also required at the time of DUPRO, samples will be pulled and packaged by approved lab partner. The lab partner will photograph the samples and seal the cartons with tamper proof closures. The factory/vendor is responsible for shipping the sealed carton to the lab for production testing (See Section 2.3 Product Testing).

A FRI may be required to further assure quality compliance. The inspection will occur when a purchase order is 100% manufactured and at least 80% packed. Detailed inspection requirements can be obtained from the CBH approved lab partner. A FRI will be performed

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upon request from CBH or if there is a significant failure during a DUPRO inspection; the cost of the inspection is the responsibility of the vendor. The vendor will be notified of this requirement as soon as possible.

Witness Destruction Inspection by our approved third party agent(s) or lab partners may be required for regulatory failures for children's products or other product failures.

3.2 Outbound Product Inspection Processes

Product Inspections apply to products manufactured for CBH wherein CBH is Importer of Record and are managed outside of an agent. Poor performing vendors may be subject to third party inspections based on past testing history (regardless of importer of record). CBH Quality and Compliance online booking forms shall be completed by the vendor when requesting an inspection. Complete and accurate booking forms are the vendor's responsibility. Booking forms are available on the ITS and BV websites. See CBH Quality and Regulatory Compliance Program Directory for contact information. CBH approved reference samples are required to be at the factory for inspections to take place.

Failure to comply and pass the DUPRO or FRI can result in late shipment, product rework, added expediting cost or canceled purchase orders. See CBH Quality and Regulatory Compliance program directory for lab contact information.

Note: All costs associated with the product inspection are the responsibility of the vendor.

3.3 Inbound DC Inspections

To further complement our product quality and transit testing program, we have an inbound quality assurance inspection program in our Distribution Centers (DCs). The inbound inspection program is based on a random sampling method, a list of audit criteria developed by our merchandising teams, and an acceptable quality level. We use a risk based approach to determine which vendors/SKU's will be inspected. Some examples of what constitutes a risk vendor/SKU would be failed outbound inspections, or previous Correction Projects completed upon receipt. If an inbound inspection is required our QA team will inspect the product according to the following categories:

- Labeling – must meet labeling requirements set forth in the Vendor Operations Guide.
 - Packaging – ensuring that the packaging is executed according to the product transit test results or agreed upon packaging.
 - General Appearance and Construction – comparing the production to the approved sample in terms of overall quality, color, performance, and acceptable characteristics.
- ***Please note that a signed/approved sample is required to be present wherever the inspection is taking place.

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Our goal is that every shipment will meet our expectations, however if they do not meet these requirements, a correction project as noted below may occur:

- The item may be returned at the vendor's expense to the vendor for repair or replacement.
- The item may be repaired at the vendor's expense at a third-party facility or a CBH DC.
- The entire shipment may undergo a 100% inspection at the vendor's expense to identify any acceptable goods.
- Unacceptable goods may be returned to the vendor or disposed of.
- Depending on the nature of the issue, the shipment may be accepted with the understanding that future shipments will be corrected with agreed upon improvements.

The cost for any of the above solutions is the responsibility of the vendor.

The cost is a minimum of \$500.00 per DC location where the correction project is performed

or

The actual cost of the project based on \$64.00 per man hour + materials and disposal fees if applicable, per DC location where the correction project is performed, whichever is greater.

Ongoing inspections are done throughout the year on products with higher than average return rates, known quality or performance issues, or shipments that failed the initial quality inspection.

Section 4: Restricted Substances & Additional Requirements

4.1 California Proposition 65

CBH requires its products to comply with California Proposition 65 (Prop 65) either by reformulation, or if reformulation is not possible, by including warning labeling and signage¹. CBH preference is to always have a product made either completely free of OEHA listed chemicals or with chemical content below the established settlement limits.

In the event that a vendor's product contains required warning language, the vendor must contact CBH's authorized agent by emailing prop65info@crateandbarrel.com as required by California law. Only written notices sent to prop65info@crateandbarrel.com will be considered as received by CBH, and must include 1) a statement that the product may result in an exposure to a listed chemical, 2) the SKU(s) of the product(s) or other identifying information,

¹ Signage is only required in specific instances. Please contact prop65info@crateandbarrel.com for more information

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and 3) all the necessary warning materials (such as labeling, shelf warnings, warning language for online display).

For additional information about Prop 65 please refer to <https://www.p65warnings.ca.gov/>. For questions about acceptable label formats, warnings, or reformulations reach out to prop65info@crateandbarrel.com.

4.2 Flame Retardants

CBH has a strict no added chemical flame retardant policy for upholstered furniture, and vendors must ensure that any upholstered furniture complies with this. Regular testing and verification of supply chain is strongly suggested. If a vendor's product is known to contain or may contain chemical flame retardants, please reach out to the Quality and Regulatory Compliance team for additional information.

4.3 Azo Dyes

CBH has a strict policy banning the use and presence of azo dyes in textile products. Regular testing and verification of supply chain and materials is strongly suggested.

4.4 TSCA Title VI Formaldehyde Emissions Standards

The Environmental Protection Agency regulates the amount of formaldehyde emissions from composite wood material - Medium Density Fiberboard (MDF), Particle Board (PB), and Hardwood Plywood (HW-PW). These standards are among the most stringent in the world. The law requires that lumber mills producing composite wood materials undergo a certification to ensure compliance with these limits. In order for customers to determine that the goods comply with the law, all composite wood materials as well as finished goods are required to be labeled as compliant.

For items made with any MDF, Particle Board, or Hardwood plywood components, one of two different labels should be placed on the back or bottom of the product, on the outside of the carton, and on the invoice (see the labels are pictured below). The first version should be used if the composite wood generally complies with the TSCA Title VI requirements. The second version should be used if all composite wood is from certified ULEF materials. Note that vendors must use the below TSCA Title VI declaration labels CARB declarations labels are no longer accepted. The following statement also needs to be on the commercial invoice: "TSCA Title VI Compliant for Formaldehyde"

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TSCA Title VI label for product with non ULEF based materials:

Made for Crate and Barrel. TSCA Title VI Compliant for Formaldehyde. Fabriqué pour Crate and Barrel. Conforme au titre VI de la TSCA concernant le formaldéhyde. Hecho para Crate and Barrel. Cumple con el Título VI de TSCA para formaldehído.

MM/YYYY

“MM/YYYY” to be replaced with the date of manufacture (in MM/YYYY format)

TSCA Title VI label for product with all ULEF based all composite wood materials:

Made for Crate and Barrel. TSCA Title VI Compliant for Formaldehyde. Produced with all ULEF-based products. Fabriqué pour Crate and Barrel. Conforme au titre VI de la TSCA concernant le formaldéhyde. Fait entièrement de produits conformes à la norme ULEF. Hecho para Crate and Barrel. Cumple con el Título VI de TSCA para formaldehído. Fabricado con un producto a base de ULEF.

MM/YYYY

“MM/YYYY” to be replaced with the date of manufacture (in MM/YYYY format)

Additionally, for our systems and notification to the EPA, we will be asking import suppliers that provide composite wood products to provide a certification document for our files.

More information regarding this law and labeling requirements can be found at:

<https://www.epa.gov/formaldehyde/formaldehyde-emission-standards-composite-wood-products>

4.5 Sharp Tools and Metal Object Policies

All vendors are required to implement documented sharp tools and metal object policies for each factory location. Examples of policy points include but are not limited to:

- Sharp tool control procedures - vendors should maintain a daily log of all persons issued a sharp tool, manage the access to sharp tools, track if any sharp tools break or wear out, and manage the disposal of any sharp tools. Any tools used should be tied or otherwise secured to the workspace as best possible to ensure they are not accidentally packed with merchandise.

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- Needle control - in addition to the sharp tool procedure details above, vendors should set up procedures to ensure all parts/fragments of broken needles are found in the event of breakage, that any and all needle breakages are recorded, and that needle records are routinely reviewed for accuracy.
- Metal detection - vendors should implement the use of a tunnel type metal detector capable of identifying metal fragments to a sensitivity level of 1 - 2 mm diameter of a ferrous standard. Metal detection calibration should be regularly performed and logged, and in the event of any calibration failures, the failure should be logged and any items checked must be re-checked and notes made regarding any contamination failure (date, type, location, etc).

Note that the above policy points are only examples of components that may be found in a comprehensive sharp tool and metal object policy. Each vendor should review every manufacturing location and develop policies that best fit them.

Additional information regarding sharp tools and metal object policies can be obtained from CBH Quality and Regulatory Compliance team.

4.6 Tracking Label Requirements

CBH requires any children's products and all furniture articles to be labeled with tracking information that includes the CBH Purchase Order number and the product manufacture date. The PO # and manufacture date may be incorporated into a singular Crate and Barrel, CB2, or Crate and Kids label, or may be included as a secondary label separate from a stock barcode or similar label. An example of each can be found below. This requirement may later be extended to include all product categories and will be communicated to vendors at that time by the CBH Quality and Compliance team.

Crate and Barrel
Northbrook, Illinois 60062 USA

Cornflower
Pennie Sofa

255-614
Made in China

PO # 940-8064475
10/2018



PO # 854-9220182
02/2017

CPSIA also mandates that tracking labels be provided for items determined to be children's products (see labeling guide for additional information). These labels require more detail than a general product label requirements. Your merchandising team and the Product Regulatory

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Department (product- test@crateandbarrel.com) can provide more details about these labels if a product is considered a Children's product. Additional information can be found at:

<https://www.cpsc.gov/Business--Manufacturing/Business-Education/tracking-label>

4.7 Toxics in Packaging Clearinghouse

In order to comply with CBH Toxics in Packaging Clearinghouse (TPCH) requirements, vendors must provide a signed self certification document attesting that any and all packaging materials used with the submitted product complies to the intentional and incidental heavy metals requirements of TPCH. Please refer to the Legal section below for additional information about the regulation.

Section 5: Legal

There are many regulations regarding product safety, performance and composition, and these regulations vary based on materials (metal, wood, ceramics, glass, plastic, etc), manufacturing processes, and product type. CBH vendors must be aware and are responsible for complying with all applicable U.S. (Federal and State) and International legal requirements for their products for each shipment sent to CBH. Below is a summary of some commonly referenced laws and regulations to which vendors of CBH may be subject. Additional laws or regulations may apply. Please refer to product testing protocols or reach out to the Quality and Compliance team for more information.

This summary is intended for information purposes only and should not be considered a complete explanation of any or all applicable laws. Nothing in this Manual is to be considered as rendering legal or professional advice for any specific matter. Vendors are responsible for complying with all applicable laws and for confirming such compliance with their own legal counsel if necessary.

5.1 Consumer Products Safety Improvement Act (CPSIA)

Through the Consumer Products Safety Improvement Act (CPSIA) of 2008, the US government published new product safety regulations, governing children's products (e.g. toys, nursery products, etc.) and general use items (rugs, mattresses, furniture, etc.). The regulations cover mandatory testing requirements, product safety standards, and recall procedures.

The CPSIA also requires domestic manufacturers or importers of non-children's products to issue a General Certificate of Conformity (GCC). These GCCs apply to products subject to a consumer product safety rule or any similar CPSC rule, ban, standard or regulation enforced by

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the CPSC. Products that require a GCC will not be allowed to ship without passing product testing and GCC documentation. Additionally, the manufacturer or importer of children's products is required to issue a written Children's Product Certificate (CPC) which certifies that its children's product complies with all applicable children's product safety rules (or similar rules, bans, standards, or regulations under any law enforced by the Commission for that product). Additional information about GCCs and CPCs can be found on the CPSC website and can be requested from a CBH approved test lab. A list of all the regulations, standards, and bans established by the CPSC may be seen here:

[\(https://www.cpsc.gov/en/Regulations-Laws--Standards/Regulations-Mandatory-Standards-Bans/\)](https://www.cpsc.gov/en/Regulations-Laws--Standards/Regulations-Mandatory-Standards-Bans/).

Note that if an item is unregulated, any safety issues must still be brought to the attention of the appropriate merchandising team and the Product Regulatory Department.

5.2 Federal Food, Drug, and Cosmetic Act (FD&C 21 CFR 1 et)

Food Safety The US FDA (Food & Drug Administration) enforces laws regarding the manufacture and importation of food, drugs, medical equipment, and laser devices.

5.3 Federal Hazardous Substances Act – 16 CFR 1500.48-53

Enforced by the Consumer Products Safety Commission, this act intends to protect children from risk or injury caused by consumer products. This act addresses choking hazards, sharp points, sharp edges, and the testing of toys and other articles that may be used by children.

5.4 Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)

The Federal Insecticide, Fungicide and Rodenticide Act provides regulates pesticide distribution, sale and use, including antimicrobial pesticide intended to disinfect or sanitize object and surfaces.

5.5 Flammable Fabrics Act - 16 CFR 1602-1632

The Flammable Fabrics Act established standards for the flammability of clothing, carpets, rugs, children's sleepwear, mattresses and mattress pads.

5.6 Standard for the Flammability and Open Flame Flammability of Mattress Sets - 16 CFR 1632 and 1633

All mattresses, mattress pads, and mattress sets must comply with the standards and testing requirements in 16 CFR 1632 and 1633 regarding flammability.

5.7 Textile Fiber Identification Act

The Textile Fiber Identification Act requires textile products to be labeled with the generic names and percentages by weight of each fiber in the garment or textile product. The textile must also be labeled with the name of the responsible party or RN number, either of which must be accompanied by the name of the country where the product was manufactured.

5.8 The Model Toxics in Packaging Act (formerly known as CONEG)

This legislation prohibits the intentional addition to packaging of any amount of lead, cadmium, hexavalent chromium, or mercury and otherwise places limits on the amounts of lead, cadmium, hexavalent chromium, and mercury that may be incidentally introduced to product packaging materials. TPOH also requires vendors to obtain and retain certificates of conformity confirming that the product packaging complies with this legislation.

5.9 Toxic Substances Control Act Title VI

Formaldehyde Emissions Standard: As of June 1, 2018, the Title VI regulation includes detailed requirements that limit formaldehyde emissions, as well as impose labeling and recordkeeping requirements. This law regulates all composite wood products, including panels, component parts, and finished goods, made from or consisting of hardwood plywood (HWPW) with composite or veneer cores (CC, VC), medium-density fiberboard (MDF), and particleboard (PB).

5.10 Illinois Lead Poisoning Prevention Act

Illinois law requires warning labels for child care articles and children's jewelry whose lead content levels in substrates and coatings exceed 40 ppm, and for toys whose lead content levels in coatings exceed 40 ppm. Please note that for Company vendors, products that are considered child care articles, children's jewelry, or toys must have lead content levels below 40 ppm for coatings and/or substrates as the Company will not accept labeled product. More information regarding this act can be found at:

<http://www.ilga.gov/legislation/publicacts/fulltext.asp?Name=095-1019>

5.11 Food Contact Labeling

Ceramic food contact items must be permanently marked on the physical product with our name, as well as the country of origin. This is commonly called a “backstamp”, and the merchandising team will provide artwork. Performance attributes may also appear on these backstamps, such as Dishwasher Safe, etc. at the discretion of the team.

Decorative items such as a bowl that appears as if it may be used for serving, preparation or storage of food or drink, but which have not been tested to comply with these regulations, will need a permanent sticker on the physical product that states “For Decorative Use Only,” in English, French and Spanish.