



## INNOVATION LINE/INNOVATION SPECIALTIES COMPLIANCE PROGRAM 2015

### 1. CPSIA – Compliance:

Innovation Line is in compliance with all aspects of The Consumer Product Safety Improvement Act of 2008 (CPSIA) (Public Law 110-314).

- a. All products determined to be children's products are rigorously tested for lead, phthalates, mechanical, and flammability requirements as applicable under sections **16 CFR 1107**. Current lead limits are under 90ppm. We use third party testing labs such as STR, SGS, and Intertek which are required for all children's products by 2013. We have been testing via third party labs since 2008 <http://www.cpsc.gov/info/toysafety/3pt.html>

*15 U.S.C. § 1278a (preferred citation) or Sec. 101 of the Consumer Product Safety Improvement Act of 2008, Pub. L. No. 110-314 (August 14, 2008) (CPSIA), Ban on Total Lead Content in Excess of 100 ppm in Children's Products.*

*16 CFR Part 1303, Ban of Lead-Containing Paint and Certain Consumer Products Bearing Lead-Containing Paint for Toys and Other Articles Intended for Children.*

*16 CFR Part 1501, Small Parts Ban for Toys and Other Articles Intended for Children under 3 Years of Age which Present Choking, Aspiration, or Ingestion Hazards.*

*Toy Safety Standard, ASTM F 963-11 Section 4.3.5.2 Heavy Elements in Accessible Toy Substrate Materials.*

*15 U.S.C. 2057c (preferred citation) or Sec. 108 of the Consumer Product Safety Improvement Act of 2008, Pub. L. No. 110-314 (August 14, 2008) (CPSIA), Permanent and Interim Ban on Phthalates in Toys and Child Care Articles Used to Facilitate Sleeping or Eating. (We do not carry any of these types of products).*

- b. All required, as well as most of our products, are accompanied by either a **CPSC** – Children's Product Safety Certificate or General Certificate of Conformity Statement (CCC) which are posted on our website and readily available for customers to review. Innovation Line does not currently carry any child specific products; however, using an age testing scale, we do test many of our products as children's products as a pro-active precautionary measure to ensure safety.
- c. All required, as well as most of our products, are accompanied by a **GCC**--General Certificate of Conformity Statement on our website, readily available for customers to review.

- d. 16 CFR 1107.20 -Certification of Children's Products (CPSC) section **16 CFR 1107.24 - Undue Influence** -Statement of Policy –ISI follows strict adherence to this policy and have safeguards in place against exercise of undue influence to any 3<sup>rd</sup> party testing laboratory.
- e. Additionally, we place **tracking labels** with lot # and contact information of many of our products as required by the CPSIA and should there ever be a product recall.
- f. **Ink Compliance** - ALL inks used by Innovation Specialties are compliant with CPSIA standards- this information is posted on our website; main page > product safety > ink compliance.

## 2. **CA Prop 65 – Compliance:**

Innovation Line complies with all aspects of CA Proposition 65, the Safe Drinking Water and Toxic Enforcement Act of 1986, which was enacted as a ballot initiative in November 1986. The Proposition was intended by its authors to protect California citizens and the State's drinking water sources from chemicals known to cause cancer, birth defects or other reproductive harm, and to inform citizens about exposures to such chemicals. <http://www.oehha.org/prop65.html>

- a. Innovation Line tests its products via the same third party testing labs as above to comply with California Prop 65.
- b. Innovation Line posts GCC's – General Conformity Certificates (same as used above in for CPSIA compliance) -- and these are also posted on our website, readily available for customers to review.
- c. Additionally, we work diligently to comply with other state specific testing requirements, as these change periodically with legislation.
- d. **Ink Compliance** – ALL inks used by Innovation Specialties are compliant with CA Prop 65 regulations, along w other state regulations-this information is posted on our website: main page > product safety > ink compliance.

## 3. **MSDS- Material Safety Data Sheets:**

Which can be used to comply with OSHA's Hazard Communication Standard, 29 CFR 1910.1200.

- a. Our facility keeps MSDS sheets on hands for all applicable products. In addition, when applicable, we place a copy of these sheets on our website, readily available to our customers.

#### 4. FDA Compliance:

- a. Medical Devices: Innovation Line registers necessary medical device products with the FDA: <http://www.fda.gov/MedicalDevices/default.htm>

Our Facility Registration number is #1000300091 – 2015

Registration Number	1000300091
FEI Number	1000300091
Registration Status	Active
Registration Status Reason	Registration active
Initial Importer	Y
Facility Name	INNOVATION SPECIALTIES
Facility Address	11869 TEALE ST, CULVER CITY , CALIFORNIA , 90230 , USA

#### Device Registrations:

1. Dental Floss - # D117461
2. Sunglasses - # D194912
3. Hot/Cold Pack - #D221244

- b. FDA-Drug Establishment Registration Information:

FDA electronic Drug Registration and Listing: 2015  
#1000300091 # Labeler Code # 76138  
INNOVATION SPECIALTIES INC  
11869 TEALE STREET, CULVER CITY, CA 90230

FDA Establishment Identifier (FEI): The FEI number, also referred to as registration number is assigned to firms that are required to register (Refer to regulation 21 CFR, Part 207).

Requirements for drug establishment registration and drug listing are set forth in section 510 of the Federal Food, Drug, and Cosmetic Act (the Act) and section 351 of the Public Health Service Act (the PHS Act), and 21 CFR Part 207.

FACILITY #1000300091

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FEI Number	1000300091
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PRODUCT LISTINGS w NDC #

Product #	ITEM CATEGORY	ISI-NDC #
5242	Hand Sanitizer	76138-101-05
5242	Hand Sanitizer	76138-111-05
5245	Hand Sanitizer	76138-001-01
5247	Hand Sanitizer	76138-102-06
5247	Hand Sanitizer	76138-111-06
5248	Hand Sanitizer	76138-107-07
5253	Hand Sanitizer	76138-103-02
5254	Hand Sanitizer	76138-104-02
5258	Hand Sanitizer	76138-105-03
5296	Hand Sanitizer	76138-107-03
5257	Sunscreen	76138-201-04
5278	Sunscreen	76138-202-04
5283	Sunscreen	76138-203-09
5283	Sunscreen	76138-204-01

c. FDA related testing:

Innovation Line or our manufacturers work to test products that may specifically not fall under CA Prop 65 or CPSIA testing such as BPA, Total Lead, Cadmium, PVC, Migration or FDA extraction tests.

**5. Innovation Line Product Safety Statement**

Innovation Line is committed to offering products which are safe and suitable for their intended purpose as promotional products. All of Innovation Line's products are comply with all applicable Federal laws including the rules and regulations promulgated by the U.S. Food and Drug Administration and the Consumer Product Safety Commission (CPSC). The CPSC has recently enacted new regulations under the Consumer Products Safety Information Act (CPSIA) which, among other things, prohibits certain levels of lead in the products we sell. All of Innovation Line's products which fall under the CPSIA have been tested and comply with the requirements of the statute. We can provide specific testing data upon request.

Innovation Line's products are also in compliance with California Proposition 65, known as the Safe Drinking Water and Toxic Enforcement Act of 1986, which seeks to protect persons from unsafe levels of lead and other chemicals as published in the statute. The printing inks used by Innovation Line have been tested and do not contain chemicals at concentrations

<p>requiring a CA Proposition 65 warning label. If we should sell a product which requires a warning label under Proposition 65 it will be included per the statute and state:</p>
<p><b>WARNING: This Product may contain chemicals known to the state of California to cause cancer, birth defects or other reproductive harm.</b></p>
<p>Innovation Line is also committed to socially responsible business practices. We personally visit and audit our foreign factories to ensure they are not using forced or child labor, that their facilities are safe and secure for their employees and that the health and welfare of their employees is paramount. Our factories follow all local health and safety laws and compensate and insure their employees as proscribed by their local governments.</p>
<p>Innovation Line has its own Compliance Committee composed of our senior most management including our President, Operations Manager, Production Manager and Overseas Purchasing Manager. The Compliance Committee meets regularly and reviews every new product to ensure it meets all of the laws as described above.</p>
<p>If you have further questions regarding this product safety statement, please contact us at <a href="mailto:productsafety@innovation-line.com">productsafety@innovation-line.com</a>.</p>

**6. Innovation Line Code of Conduct**

<p align="center"><b>Code of Conduct</b></p>
<p>INNOVATION LINES COMMITMENT TO ETHICAL AND RESPONSIBLE CONDUCT Our Company believes we must not only meet the expectations of our customers and consumers, we must exceed those expectations. To that end, we have adopted standards for the safety, quality and integrity of our products and processes and we are committed to respecting the rights of individuals and protecting the environment. We are dedicated to complying with all applicable laws and to conduct business in an ethical and responsible manner.</p>
<p><b>Product Safety</b></p>
<p>We will comply with all applicable laws and regulations regarding safety of products we sell. We will meet applicable recognized voluntary industry standards for our products and processes.</p>
<p><b>No Abuse Of Labor</b></p>
<p>We will not use any form of forced labor, including indentured, prison, bonded or slave labor. We will not use physical or verbal harassment or abuse to discipline</p>

employees.
<b>No Child Labor</b>
We will not use child labor. We will comply with all minimum age provisions of applicable laws and regulations.
<b>Freedom Of Association</b>
We respect the rights of employees to associate or organize without fear of reprisal or interference. If employees are represented by an organization recognized under law, we respect the right to bargain collectively.
<b>No Discrimination</b>
We will not discriminate in hiring and employment practices on the basis of age, nationality, race, religion, social or ethnic orientation, gender or disability.
<b>Hours And Wages</b>
We will comply with all applicable wage, work hours, hiring, benefits, and overtime laws and regulations. In the absence of law in a particular location relating to product safety, labor, employment, environment or working conditions, the spirit and intent of these policies shall be met.
<b>Workplace Conditions</b>
We will provide a safe, healthy and secure workplace. We will abide by all applicable laws and regulations for safety and health. Proper sanitation, lighting, ventilation and fire safety protection will be provided.
<b>Environment</b>
We abide by all applicable environmental laws and regulations. We will manage our environmental footprint to minimize the adverse impact on the environment. We will manage our energy, water and waste systems for maximum efficiency and minimal adverse impact on the environment.
<b>Subcontractors And Sources</b>
We require all businesses that support our business as subcontractors, manufacturers or sources of goods to comply with all of the same policies stated in our Commitment to Ethical and Responsible Conduct Policy. All subcontractors and suppliers are required to comply with all applicable and national laws. We expect those businesses to develop and implement internal business procedures to ensure compliance with our policy.

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