



## L. M. Becker & Co. Inc. Product Safety Policy and Procedures

This safety testing procedure is included within our Purchasing Terms & Conditions policy, which governs the business relationships we have with our suppliers and manufacturers. They must comply with these safety testing regulations at all times in order to maintain their continued status as a supplier of products for L.M. Becker & Co., Inc.

1. Pre-production samples are tested against the Mechanical Hazards standards before production begins to ensure that the design of the item is considered safe (no sharp points or edges, no choking hazard issues, non-flammable, etc.)
2. Upon our verification that the samples pass the Mechanical Hazards tests, we authorize the supplier to proceed with a short production run.
3. The machines are then stopped and production is put on hold until we give them approval to proceed.
4. These production samples are sent to our office directly from the supplier. The items received are quality inspected and multiple samples of each item received are sent to a U.S. accredited testing lab\* and are tested against the Lead Content and Heavy Metals standards (Arsenic, Cadmium, Lead, Mercury, etc.)
5. The U.S. Consumer Product Safety Commission (CPSC) issued a guidance in February 2005, setting the maximum allowable amount of total lead in children's jewelry at 600ppm (parts per million). Contained within our policy, we voluntarily set a target maximum allowable level much lower at 200ppm or less. We feel that by targeting a maximum of 200ppm total lead in an item, we account for the slight variances that occur when testing multiple pieces from the same lot of the item received. Additionally, our voluntary maximum limit of 200ppm puts further pressure on the suppliers and manufacturers to purchase their production materials (metals, paint, etc.) from lots that test much lower than 600ppm maximum and not those materials that might barely test under the maximum at 590ppm, for example. By setting this company standard back in 2005, we currently show that about 90% of our items fall under our 200ppm voluntary standard with approximately 80% of our inventory reporting under 100ppm.
6. Upon receipt of passing Lead Content and Heavy Metals test results, we authorize the supplier to proceed with the production, and the machines produce the remaining items on the order.
7. Upon receiving the finished goods in our Texas warehouse, items are quality inspected and 12 sample pieces of every item received on each shipment (including re-ordered items) are pulled at random by our warehouse staff and are sent to be tested again against the Lead Content and Heavy Metals standards, to be certain that nothing changed during the course of production. The items remain "on hold" until we receive the test results from the lab.
8. Receipt of test results:
  - a. If we find that the safety tests for these items fail, the goods will be exported back out of the country to the supplier at their expense. The supplier will issue full credit to us for the cost of the shipment including the freight incurred to ship the items back. Therefore, it is in the supplier's best interest to ensure that their factories follow these guidelines knowing that we will be performing full inspections on every shipment of goods received.
  - b. Upon receiving the passing safety test reports for the items received, the item is released from "hold" and approved for distribution.

By following this order of procedure, our company can prevent potentially dangerous items from being distributed into the hands of small children.

\*All safety tests referenced above are conducted at Bureau Veritas Consumer Products Services, Inc., which is an accredited testing lab with approved facilities all over the world. All of our products must pass the following safety tests (those applicable to each item) for approval before being distributed to the public:

### Mechanical Tests

- 16 CFR 1500 Mechanical Hazards
- ASTM F963 Mechanical Hazards
- Pennsylvania Stuffing 47.317

### Flammability

- 16 CFR 1500.44 Flammability (solids)
- ASTM F963 (solids)



Chemical Tests

- 16 CFR 1303 Lead Content
- ASTM F963 Heavy Metals
- DEHP
- CPSC Lead in Children's Jewelry
- California Proposition 65

Micro/Toxicity Tests

- 16 CFR 1500.3(c)(4) Skin
- 16 CFR 1500.3(c)(4) Eye
- 16 CFR 1500.3(c)(2)(i) Oral
- TRA (Toxic Risk Assessment)
- USP <51>
- USP <61>

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***Testing Standard Definitions***

ASTM - American Society for Testing and Materials [www.astm.org](http://www.astm.org)

CFR - Code of Federal Regulations [www.gpoaccess.gov](http://www.gpoaccess.gov)

CPSC - U.S. Consumer Product Safety Commission [www.cpsc.gov](http://www.cpsc.gov)

USP - The United States Pharmacopeia [www.usp.org](http://www.usp.org)