

## Product Safety and Compliance Program

Caps Direct is committed to a continued product safety compliance program, providing you with assurances that all products by Caps Direct are in compliance with the following requirements as set forth in the Consumer Product Safety Improvement Act (CPSIA) that was passed into law on August 14, 2008. Compliance is confirmed by third party laboratory testing as follows:

1. **Lead Paint/Surface Coating** – limit of 90 ppm (effective August 14, 2009) – Caps Direct follows the CPSIA regulation for Children’s products containing lead and lead paint rule. While this limit was established for the purpose of children’s products under the CPSIA, due to varying state regulations, implementation of this limit is administered for all fabrics, trims, and decorations, where applicable, for both adult and children’s products. Testing will be conducted by a CPSIA accredited third party laboratory.
2. **Lead Substrates** – limit of 100 ppm (effective August 14, 2011) – Caps Direct follows the CPSIA regulation for Children’s products containing lead and lead paint rule. While this limit was established for the purpose of children’s products under the CPSIA, due to varying state regulations, implementation of this limit is administered for all fabrics, trims, and decorations, where applicable, for both adult and children’s products. Testing will be conducted by a CPSIA accredited third party laboratory.
3. **Flammability** – Caps Direct follows the CPSIA regulation on the Standard for Flammability of Clothing Textiles (16 CFR Part 1610). While our products are generally exempt, when fabrics and products are not exempt from testing in accordance with the CPSIA rule, a third party independent lab test report for Wearing Apparel Flammability – U.S CFR Title 16 Part 1610 will be required.
4. **Sharp points/Sharp Edges** (children’s products only) – Caps Direct follows the CPSIA law on hazardous sharp points (16CFR 1500.48) or edges (16 CFR 1500.49) Any children’s product with components that could be found to present a sharp point or edge before or after any reasonably foreseeable damage or abuse will be submitted to a CPSIA accredited third party lab for testing.
5. **Small Parts** (children’s products for ages 0 – 3 years only) - Caps Direct follows the CPSIA law on Small parts (16 CFR 1501 and 16 CFR 1500.50-53). Any product and/or its components that could potentially present a choking hazard before or after any reasonably foreseeable damage or abuse will be submitted to a CPSIA accredited third party lab for testing.
6. **Phthalates** - limit of 1000 ppm (as identified federally and state specific) – Caps Direct follows the CPSIA regulation for Children’s products containing specified phthalates. While this limit was established for the purpose of children’s toys and childcare products under the CPSIA, due to varying state regulations, implementation of this limit is administered for all fabrics, trims, and decoration, where applicable, for both adult and children’s products. Testing will be conducted by a CPSIA accredited third party laboratory.
7. **Formaldehyde** - All applicable products must pass the AATCC 112-1998 test conducted by an independent third party lab.
8. **Toxics in Packaging** – Caps Direct follows the US developed Model Toxics in Packaging Legislation to reduce the amount of heavy metals in packaging and packaging components sold and distributed throughout the Unites States to avoid adverse effects on the environment after our packaging is discarded.
9. **Labeling Requirement** – Caps Direct follows the FTC’s labeling requirement under the Textile and Wool Act on the fiber content and country of origin. In addition, we require tracking labels on all children’s products and packaging in compliance with the CPSIA’s regulation on tracking labels for children’s products effective August 14<sup>th</sup>, 2009. All labels for our children’s products enable the importer to ascertain the manufacturer, location, date of production and certain cohort information, as discussed in Section 103 of the CPSIA.

Caps Direct is committed to the highest quality and safety standards for all of the products we sell. It is our policy to meet all applicable Consumer Product Safety Commission (CPSC) regulations and all applicable State laws and regulations, including the California Safe Drinking Water and Toxic Enforcement Act of 1986 (CAL Prop. 65) as they pertain to our products. A General Certificate of Conformity or a Children’s Product Certificate will be available for all of our products upon request. Please be advised that any certifications we provide are for the finished products that we sell. If a blank product we sell is later decorated or modified by a third party, our testing and certifications will not apply to the decoration or modification.

If you have any questions about our program, please contact [compliance@capsdirect.com](mailto:compliance@capsdirect.com). You may also call Customer Service at (913) 693-7000.