

Kohl's Testing Program for Apparel & Apparel Accessories

Program Scope

The Kohl's Testing Program has been set-up to ensure that all private and licensed brand products meet the company's expectations of product quality and all federal/state/city regulatory compliance mandates. All vendors are responsible for ensuring that the products they ship to Kohl's are in compliance with the requirements outlined in this manual. If a vendor is not able to meet Kohl's Testing Program, it is the responsibility of the vendor to notify Kohl's at the time of order placement. Kohl's Testing Program is for the benefit of Kohl's and does not replace the vendor's own monitoring.

Kohl's requires vendors to stay up-to-date on the laws that govern the sale of textiles and related consumer products in the USA. It is the vendor's responsibility to ensure that merchandise shipped complies with all applicable regulatory standards. Merchandise in violation of such laws will be subject to cancellation and vendors will be fully responsible for any associated fines, penalties, lost sales or other financial ramifications caused by any such violation. A partial list of federal and state regulations is as follows:

- The Consumer Product Safety Improvement Act of 2008
- California Proposition 65
- The Care Labeling Rule, 16 CFR Part 423
- The Textile Fiber Products Identification Act, 16 CFR Part 303
- The Flammable Fabric Act, 16 CFR Parts 1610, 1615, 1616, 1631, 1632, 1611
- The Wool Products Labeling Act, 16 CFR Part 300
- The Fur Products Labeling Act, 16 CFR Part 301
- Hazardous Substances and Articles, 16 CFR Part 1500
- Ban of Lead-Containing Paint, 16 CFR Part 1303
- Plumage Regulations, State of California Title 4 BHFTI Rules & Regulations, Article 5
- Flammability Regulations, State of California Title 4 BHFTI
- Rules and Regulations, Article 13 -TB 117, 603, 116
- Labeling of Filling Materials, State Requirements
- Customs Duties Country of Origin Marking, 19 CFR Part 134
- Product Size Specifications
- Etc.

Kohl's has contracted with independent laboratory testing services. Kohl's will only accept test results issued by an accredited third party lab. Laboratory locations & contact information can be found on K-Link website (https://link.kohls.com).

Testing At a Glance:

Kohl's Product Integrity has updated requirements for testing. These requirements differ among denim, washed and all other apparel in regards to the stages of testing required. To avoid confusion regarding what stages of testing are necessary, please review the below chart and reach out to Kohl's PI team if there are any questions prior to beginning the process.

TESTING REQUIRED FOR DENIM/WASHED APPAREL				
	Development Testing	Core Production Testing		
Fabric/ Development	Pre-Production Garment *Testing MUST be completed before the fit process begins*	Production Fabric	Production Garment	
X	Х	Х	Х	

** If a style carries over from one season to another, (eg. FA23 to SP24) re-testing will be required in the fabric/development stage.

	TESTING REQUIRED FOR ALL OTHER APPAREL					
	New/Adopted Development	Pre-Production Fabric	Production Fabric	Production Garment		
Type of Fabric						
New/Adopted	х			х		
Existing			х	Х		

New: Test Type Selection & Definitions:

Please refer to the document titled "Test Types: Options & Definitions", on KLINK. This document ensures alignment between our vendor partners, third party labs, OnePLM, and Kohl's PI/QA teams. It is located in the Softline Apparel & Accessories, under Test Request Form and Test Review Process. If there are questions, please reach out to <u>quality.assurance@kohls.com</u>.

1) <u>Denim Fabric Testing</u>

To ensure that Kohl's is receiving" great" quality products, testing will be required for all denim programs effective immediately. The process is required for Raw, Rinse and Light Washes to understand the impact wash will have on denim performance in finished products. The following wash methods and codes have been identified by the Global Denim Team to establish standard wash methods as part of the Kohl's denim testing process.

Specific requirements are listed for some of the tests (as indicated below). All others are to follow the requirements as stated under protocol 102 woven fabrics and protocol 203 for Code A & Code B denim.

Testing Required	Raw Denim	Code A Rinse Wash	Code B Light Wash		
Wash Process	-	Only desize 10 min.	Desize + Enz yme Stone 45 mins + Bleach (stone added at recipe to have max stress to fabric)		
Tensile Strength	x Fail: <90 lbs	X Fail: < 50 lbs	X Fail: < 50 lbs		
Tear Strength	x	Х	Х		
Tension & Elongation	x Total Elongation: <25%	x Total Elongation: 25%- 50%	x Total Elongation: > 50%		
Stretch & Recovery	ALL: Fail: Recovery < 85%; Growth: > 7% ** For any styles with performance stretch claims, see Performance Claim Chart (see Denim SOP)**				
Dimensional Stability (warp & weft only) **	x Fail: Weft Results: ≥11% Warp Results : >3%	x	x		
Kohl's Appearance Retention (Torque & Skew only)	X Fail: Results > 3%				
Seam Slippage	х	Х	Х		
Seam Strength	х	Х	Х		
Colorfastness to Crocking	×	х			
Weight	х	Х	Х		
Fiber Content	х				

** Make sure to list the fabric denim spec weight for reference (not the finished weight)

** List spec'd yarn count & size

**List cuttable width

** Reference K-Link for most current test methods & requirements to be used.

**Tensile Strength- For any denim intended to be tight-fitting, under spec, highly destructed or have an aggressive wash, please reach out to Kohl's PI team for further guidance on this requirement.

Wash panels should be arranged by the garment vendor. Testing can be conducted at an accredited in house lab or 3rd party testing facility as outlined in the aforementioned chart. It is the Vendor's responsibility to measure and report shrinkage of Code A & B washes before submitting to the third party laboratory for denim development

testing. Code A & B wash shrinkage must be reported on the TRF under "Other" so that this information is included in the material test report.

Additional shrinkage testing for the development style/wash may be requested if shrinkage failures occur at this stage of testing.

**Any Dimensional Stability results outside 11 x 3 shrinkage MUST require pre-production discussion with Production, Global Denim Team, and QA/PI team. No overrides will be granted for raw denim results exceeding 11% weft &/or 3% warp.

** Vendors/MRs should reach out to mills to get raw and washed weight, yarn count and yarn size and fill in the Fabric TRF and Garment TRF accordingly. ie Raw weight & construction on development fabric TRF submission and washed on Garment TRF submission. Labs must include this information as data in the test report.

Kohl's PI team has set specific parameters for Dimensional Stability, Stretch & Recovery/Tension & Elongation, and Tensile Strength, which differ from standard pass/fail requirements (as referenced in the chart above). **Any results

that cannot meet these specific parameters will receive a failed rating on the test report.

**Labs must provide modulus readings (length & width) in all stages of testing.

**Wash panels should be arranged by the garment vendor. Testing can be conducted at an accredited in house lab or 3rd party testing facility as outlined in the aforementioned chart.

**Testing is the vendor's responsibility. Test reports are uploaded in OnePLM by a third party approved lab, and will be reviewed by Product Integrity and the agent/vendors.

**Kohl's Product Integrity will partner with the Global Denim Team to review test results if performance concerns surface leading up to pre-production garment testing.

Pre-Production Garment Testing (PPG):

Testing a full garment in the pre-production stage is mandatory and applies to all denim styles. The garment factory will be the owner of this testing, and must follow Kohl's 203 (Denim/Washed Garment) Protocol for PPG testing in Dark Rinse & Light Wash. Results for PPG testing MUST be completed following first fit and wash destruction comments. The garment sent for PPG testing and the garment sent for fit must be cut from the same roll of denim.

Note: After wash garments should be sent to Kohl's Corporate at the same time as the fit and PP samples upon request, at Productions' Discretion. This process should not affect the timeline to meet calendar deadlines.

Garment Bulk Production Testing:

Once PPG testing is complete & vendor either has a Passing Test Report, or a PI Accepted/ Waived Report, then Garment Bulk Production Testing can take place. Testing must follow protocol 203 and include relevant washes for the style(s). Any questions, please reach out to the Kohl's PI team.

Existing/Running Denim Fabric Testing:

Existing or Running fabrics should follow our standard bulk production fabric test requirements. This includes testing **dark rinse and light washes**, following the 102 fabric protocol. Any questions regarding the process, please reach out to Kohl's PI/QA team for assistance.

2) <u>Trims Testing</u>

Trims testing is <u>required</u> for all <u>Preferred & Non-Preferred</u> trims. Trims testing (including but not limited to zippers, buttons, heat seals, metal hardware, etc) is required to be completed on all trims and colorways during bulk fabric/trim testing. <u>If trims testing was not completed by the Trim Supplier</u>, then it is the vendors responsibility to ensure testing is completed prior to shipment. If the same trim is being used across multiple styles that trim item can be tested one time and the test report can be referenced in any applicable Full Garment Production Test Reports as a "reference test report". If multiple colorways are being used, testing can be completed as below:

- A. Initial Full Package Testing Test darkest colorway for full packaging testing
- B. **Additional Colorway Package Testing** Test the remaining colorway(s) for applicable regulatory requirements (i.e. lead, phthalates, etc.)
 - If the same metal component is being used for all colorways Lead in Substrate can just be tested one time in the full package test.

Please note: All Adult and Children products and all colorways must be tested for applicable regulatory toxicity tests.

2.1 Reduced Additional Colorway Testing

Kohl's offers reduced additional colorway trim testing. If the trim supplier uses the same substrate across the same trim style, it is expected to have no changes in the components across multiple colorways of the same trim style. If the trim is the same style and uses the same substrate across multiple colorways then Lead in Substrate can be tested one time in the full package testing as stated above and shown below:

Testing Required	Full Packaging Testing	Additional Colorway Testing		
Lead in Substrate*	х			
Lead in Surface Coating*	Х	Х		
Phthalates (plasticized materials)*	Х	Х		
Colorfastness (all CF tests)*	Х	Х		

Please reference 300 Series and 501 protocol(s) for any additional state and regulatory testing.

*Applicable where needed

Trim testing validity will follow the same guidelines as garment/fabric testing.

**Please reach out to *mr-colorist@kohls.com* for preferred and/or recommended trim supplier contact information. For any questions about trim testing, please reach out to <u>quality.assurance@kohls.com</u>.

3) <u>Pre-Production Fabric Testing</u>

Pre-production testing is <u>required</u> for all adopted fabrics (materials). Adopted fabrics are defined by fabrics that are not carryover and that enter the fit process. All adopted fabrics must be tested and completed directly from the fabric suppliers. A passing or conditionally accepted test report should be submitted with the first fit sample.

Fabrics must be compliant per our requirements under the Fabric Test Protocols – 100 series. The pre-production test consists of one <u>initial full package test</u> on one available color (same quality being submitted as an approval standard to Product Development and/or the Materials team and for the fit process). A minimum 3 yards, full width of representative piece goods must be submitted to the third party lab (certified mills are still allowed to test for certified test properties). Such testing ensures that **all** product regulatory, safety, and performance issues are addressed prior to the fit process and subsequent bulk production testing. These reports also establish a material standard for later reference. The reports will be uploaded into OnePLM. Failing reports will be reviewed by Kohl's Product Integrity team.

Platform fabrics must be identified when pre-production testing occurs, so that the Materials Team is alerted to any corrective action that needs to be taken prior to bulk production. The passing test report needs to accompany the fabric standard submission to the Materials Team.

4) Production Fabric or Piece Goods Testing

Frequency of testing is determined by the number of units or amount of time surpassed, whichever comes first (per style, per colorway). **Specific details can be found on page 10 under Frequency of Testing**

5.1) All production orders for textile fabrics must be tested and completed directly from the fabric suppliers. Textile fabrics must be compliant per Kohl's Fabric Test Protocols-100 series & be representative of piece goods.

For any given style,

A. Initial Full Package Testing -Test the darkest colorway (min 3 yards full width).

B. Additional Colorway Package Testing – Test the remaining colorway(s) per "Additional Colorway section of the appropriate protocol (min $\frac{1}{2}$ yard full width, each color).

At all times, vendors must ensure that all fabrics are tested prior to garment production. Factories can proceed with garment production **only** after getting fabric test report approvals from Kohl's Product Integrity or LF-Product Integrity. This includes but is not limited to instances when the same fabric is sourced from multiple mills or multiple fabrics used on one given style.

5.2) Fabric must be the same fiber content, fabric construction and finish as contracted by Kohl's. It is typically sufficient to base verification of the fiber content claim on test results from one color-way, with the exception of:

A. Heathers - For any given style, that comes in both solid and heather colors, if the construction of the <u>fabric is the same</u>, test the darkest solid for the full fabric package, and test the heather as an additional colorway package & fiber content. If the construction of the <u>fabric is different</u>, it is required to test the full fabric package for each construction/blend: darkest solid and one heather.

B. Cashmere - On all cashmere or cashmere blend products, it is required to conduct fiber analysis on ALL color-ways of each style. Contact Kohl's PI team for approval of grouping- This may be allowed when the same fiber is shared between multiple silhouettes/styles. Please refer to the Cashmere & Camel Hair Product Testing Standard Operating Procedure (SOP) for additional details.

C. Exemptions from fabric testing include:

- Sweaters and Heathers
- Leather & Suede Apparel/Accessories
- Vinyl, Synthetic & Imitation Apparel
- Costumes
- Seamless Foundations
- Apparel/Textile & Non-Textile Accessories
- Socks/Slipper Socks/Booties/ Tights and Hosiery/ Bras & Gowns w/ underwire
- Infant Bibs
- Belts, Jewelry, Neck ties, Bowties, Clip on Ties, Pocket Squares, Headband, Barrette, Hair Clip
- Graphic Program SOP
- Denim/Washed Apparel

** NOTE: All colorways must be tested in the garment stage**

**Going forward, all newly adopted fabrics, including washed, wet processed, resin or chemically treated products will no longer be exempt from pre-production fabric testing. We want to understand how fabrics perform before wet processing is applied. Testing fabric in the pre-production stage allows Kohl's to then proceed to bulk garment testing once passing or approved comments are made in OnePLM.

If there are any questions regarding this process, please reach out to Kohl's PI team right away.

6) Production Garment Testing

6.1) Random samples representing "<u>bulk production quality</u>," must be sent to the Kohl's approved Laboratory. The "bulk production quality" garment and/or product <u>must be representative of approved quality by Product Development</u> in the following:

- A. Fabrication, Fabric Construction, Yarn Size and Fiber Content
- B. Fabric Weight
- C. Dyeing & Finishing
- D. Wash and any sort of treatment
- E. Finished Product Construction
- F. Trims
- G. Size

6.2) Production garment testing must be completed and receive a passing test report on <u>ALL</u> styles, at least 30 days prior to shipment. <u>ALL</u> styles must be compliant per our requirements under the Garment Test Protocols – 200 series. For any given style:

A. Items that have been tested in the fabric stage require <u>ONE</u> dark colorway per style to be tested for full package garment testing (protocol 201) unless otherwise specified by **Kohl's** PI Team.

B. Styles that have NOT been tested in the fabric stage require ALL colorways per style to be tested per the following:

1) Initial Full Garment Package Testing – Test on one color (darkest colorway).

2) Additional Colorway Garment Package Testing – Test remaining color(s).

The Below Require Additional Testing, when Applicable:

1. All Adult and Children products, all colorways, MUST be tested for applicable regulatory toxicity tests.

Garments that are color blocked or have contrasting trims, or have multiple fabrications must be tested in ALL colorways for Kohl's Appearance Retention (KAR).

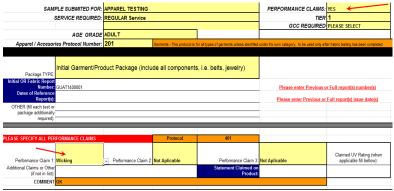
7) KWIQ (Kohl's Wash Evaluation to Insure Quality) Testing

The KWIQ program is an additional tool to ensure the after wash performance of fabric, garment or textile products meet Kohl's customer expectations and quality. This program should be implemented at both the fabric and garment/ textile product stage on every style and colorway. This is a mandatory step within the integrity process to validate the product is meeting or exceeding the standard set during pre-production testing. Please reference the KWIQ SOP for more details.

8) **Products with Performance Claims**

Products with performance claims (eg. No Iron, Easy Care, Quick Dry) MUST be tested to substantiate the claim that is called out on the product. Vendor is responsible to make sure the claim is identified/ checked off on the Test Request Form (TRF). If a claim is not listed, reach out to Kohl's PI team immediately. All information on the TRF must be accurate and filled out completely.

** Vendors are responsible to make sure performance claim(s) are tested. Kohl's can reject the goods if not tested**



9) Frequency of Testing

Adult products must be tested every 12 months or every 150,000 units per style/color, whichever comes first. This requirement applies regardless of the quantity ordered, including test or new store orders.

- Testing must also occur when there are production changes, such as:
 - A change in the factory producing the product
 - A change in materials used

Exception: All new colors must go through testing.

Children's Product Testing Requirements

- Children's products must be tested every **12 months** or after **100,000 units per style/color**, whichever comes first.
- Exceptions to this cadence are outlined below.
- If a style is reordered or goes into new production **6 months or more** after initial testing, the **vendor/factory must contact Kohl's QA/PI** (Quality.Assurance@Kohls.com) to confirm if additional testing is required.
- If the initial testing **failed** or received an **"Accept As Is"**, the test report **cannot be extended and require re-testing**.
- The following products **require testing every 6 months**, regardless of volume or other factors:
 - Children's candles
 - Children's sleepwear
 - Any item requiring **PFAS testing** (e.g., water-resistant or waterproof claims)

10) Exceptions to the Testing Program

10.1) Fabric Grouping - Should a vendor use the same fabric (fiber content/construction/yarn count etc.) and same color across multiple styles, the vendor can reference all the styles to one <u>fabric</u> test request. However, the vendor is responsible for testing <u>each</u> style in the <u>garment</u> stage.

For example - Jersey fabric in color "grape seed" is being used in an infant top, bottom and bodysuit. Fabric testing needs to be done only once however, individual garment testing on the top, bottom and bodysuit would be required.

10.2) Garment Grouping Examples: Please see the below examples of grouping. If there are any questions, please reach out to Kohl's Pl team.



Grouping Request Form

Vendor/ LF Partner should submit request to testing analyst to confirm okay to group

When submitting Testing Request Form (TRF), make sure to include grouping form, so lab knows what should be grouped.

K-Link: Grouping Form

	Grouping Request Form							
Vendor:								
Season/Program:								
Dept #:								
					For Adult or	Which Lab will it	Remarks from	
Vendor	Item #	Brand	Item Description	Item Photo	Children	be tested at?	Vendor/Li & Fung	Comment from Kohl's
L								
L								
L								
		-						
L		-						
L								
L								
L								
L	1			1				1

CANNOT GROUP IF:

• Solids / Patterns / Prints

- o All same (print with print or solid with solid) can be grouped, but cannot group solids with prints
- Across Genders
- Different Fiber Content
- Different Construction
- Different Vendors

11) Sample Submission

11.1) When?

Test samples must be selected from early production run, in order to help ensure testing can be completed before x-factory date. Kohl's recommends:

- Pre-Production Testing- Testing Complete = PRIOR to submitting for fabric & trims testing
- Fabric & Trim Testing Testing Complete = at least 50 days prior to x-factory date
- Garment Testing Testing Complete = at least 21 days prior to x-factory date

Product must be submitted to a third party lab and receive a passing test report with enough time for **corrective action** should any problems be found during product testing. It is the vendor/agent's responsibility to ensure enough time has been scheduled.

11.2) Where?

Test samples may be forwarded to the nearest test laboratory authorized by Kohl's (See approved labs and capabilities section K-Link website (<u>https://link.kohls.com</u>) for a listing of authorized laboratories).

For suppliers that have their own internal lab testing capabilities Kohl's does offer an Internal Lab Certification program. If this is something you are interested in, contact Kohl's Product Integrity for more information and requirements.

11.3) What?

The required number of samples must be sent for testing as listed on each protocol. If the laboratory does not receive the correct number of samples, testing will be put on hold. The suggested minimum number of samples is indicated on the last page of each of Kohl's Test Protocol or can be obtained by contacting the laboratory directly.

Completed Kohl's Test Request Form must accompany all samples submitted to the laboratory. Testing will not be conducted without a completed TRF and/or sufficient samples for testing. It is the vendor/agent's responsibility to complete the TRF as accurately as possible, incorrect information can cause delays.

11.4) What do I need to send for Testing?

Te	Testing Submit Checklist				
			Testing Request Form (TRF)		
			Correct # of Samples (Per Lab)		
			Packaging / Hangtags or Cads		
			Tracking Label (Children's and/ or Adult)		
			Certification (for brand name or Trademark fibers eg Lycra, etc.)		
			Import Permit (if applicable)		

12) Financial Responsibility for Testing

The financial responsibility of all costs associated with product testing (unless identified), are that of the vendor. This includes the cost of shipping the samples to the lab, and charges associated with returning tested samples to the vendor, should the request be made. The vendor will also be responsible for re-testing, should additional testing be required due to failures detected during initial testing.

The third party laboratory will bill the vendor directly for the testing charges. Vendors are required to work with the labs directly to set-up accounts, and establish terms of engagement for conducting business.

13) Test Report Revisions

If an error is made on a test report due to incorrect information submitted on the test request form by the Agent/Vendor, the Agent/Vendor will be charged a service fee for the revised/ corrected test report.

If a style number change or other Kohl's approved changes need to be made to the test report, the Agent/Vendor must send the third party lab written approval from Kohl's PI Team. When requesting approval to revise the existing test report, the vendor must provide proper information for such a request *(see Test Report Revision Guidelines on KLINK).* A service fee for the revised/correct test report will apply. **All revisions are to be made by the 3rd party lab that issued the report. **

14) Kohl's Random In-Store Audit Testing Program

It is absolutely vital that the final products shipped to Kohl's are identical in all respects to the samples submitted to Kohl's approved 3rd Party Testing Laboratory for required product testing. In order to provide further assurances, Kohl's has developed and implemented a supplemental testing program under which Kohl's will from time-to-time pull merchandise from our stores for additional testing. This testing is in addition to, and not in lieu of, all required testing and certifications that are to be performed prior to shipping products to Kohl's.

In the event that any discrepancies are found between the products tested prior to shipment and the products on Kohl's sales floor, Kohl's will reach out to the vendor to address our concerns and reach a resolution. This resolution may include, but is not limited to, additional testing on the products currently on Kohl's sales floor, "marking-down" products, pulling products off sale, issuing chargebacks for any losses incurred, including, but not limited to, any lost sales profits, on account of product discrepancy and/or issuing cost of quality charges. Nothing herein limits or otherwise restricts Kohl's ability to pursue any and all rights and remedies available under our merchandise purchase order, and nothing in this **Random In-Store Audit Testing Program** removes or reduces any obligations vendors have to Kohl's regarding the merchandise supplied to Kohl's.

Contact Information for Kohl's Private and Exclusive Brand Softlines Testing

For all queries, reach out to: product.integrity@kohls.com

Mailing Address:

<u>Menomonee Falls Office</u> Kohl's Department Stores Attn: Product Integrity N56 W17000 Ridgewood Drive – South Dock Menomonee Falls, WI 53051 Phone: 262-703-7000

REVISIONS

- **4/24/19 –** Added 8.4 "What do I need to send for testing" Checklist, including the Import Permit if applicable
- 9/10/19 Updated pre-production testing requirements
- 9/17/19 Added Fiber content labeling requirements
- **11/19 –** Overall document updates to ensure clarity in requirements.
- 3/6/20 Added Neckwear, Accessories & bras & gowns with underwire to the exemption list for material testing Supplier pre-production testing, Preferred Trim Supplier production testing, and updated format
- 4/14/20 Added Denim Fabric Development Testing requirement for all new denim effective SP '21
- **5/14/20 –** Added Trim Supplier Development Testing requirements for all new trims; updated denim development testing requirements; updated to add in information regarding certification.
- **5/15/20** Added Trim Supplier Development Testing requirements for all new trims; updated Trims Testing Section
- 5/28/20 Updated the Denim Fabric Development requirements.
- **6/29/20-** Updates to overview layout, denim development, trim development, and all other apparel testing requirements, etc.
- 2/23/21 Adopted Denim Fabric testing section updated.
- 12/3/2021 Updated to include Test Type & Definitions
- 4/20/2022 Updated to remove tier 3 from document
- 5/20/2022 Updated to add KAR & adjust Dimensional Stability parameters to denim dev testing chart
- **8/29/22** Updated Denim SOP to include wash requirements in Pre-production and fabric production stages, as well as weight, yarn count and yarn size reporting on the TRF
- 3/3/23 Updated Denim fabric testing requirements for Code A & B washes when there are shrinkage concerns
- 3/15/23 Made more updates to Denim Testing: Removed "Adopted"; made updates to denim charts, etc.
- **10/5/23 -** Updated to add chart for All Other Apparel when testing is required to be conducted (eg development, fabric, garment, etc) in section 1 of document
- 4/3/24 Updated Trim Testing guidelines
- 6/4/24 Updated Testing At A Glance table for ALL OTHER FABRICS
- 7/12/24 Updated verbiage for Trim testing to help avoid confusion
- 5/30/25 Updated children's testing requirements to be 12 months from 6 months with exceptions