

Title: **COSMETIC SOAP (liquid, bar, scrub, bath bombs)**  
 Protocol Number: **KOHL'S – 500-G**

| Test Property | Test Method | Samples | Test Principle / Requirements | Rating<br>(Section or exec. Summary which failed items can be referenced) |
|---------------|-------------|---------|-------------------------------|---|
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| <b>LABELING</b>  |   |                |  |  |
|--|---|----------------|--|--|
| *Cosmetic Labeling Review  | FDA<br>21 CFR 701 &<br>740<br>&<br>FPLA<br>16 CFR 500 | All<br>Samples | <p><u>Principle Display Panel</u><br/>(Outer or immediate package)</p> <ul style="list-style-type: none"> <li>• Statement of identity</li> <li>• Net quantity of contents</li> </ul> <p><u>Information Panel</u></p> <ul style="list-style-type: none"> <li>• Name and place of business of manufacturer, packer, or distributor</li> <li>• Declaration of ingredients</li> <li>• Directions for safe use (If applicable)</li> <li>• Warning statement (if applicable)</li> </ul> <p><u>Inner Package</u></p> <ul style="list-style-type: none"> <li>• Name and place of business of manufacturer, packer, or distributor</li> <li>• Statement of identity</li> <li>• Net quantity of contents</li> <li>• Warning statement and directions for safe use (If applicable)</li> </ul> |  |
| Country of Origin Marking<br><i>(If Imported)</i>                    | 19 CFR 134  | All<br>Samples | Shall indicate country of origin legibly and permanently and in a conspicuous place. It must also be in a close proximity and in comparable size to the name of country or locality other than the country of origin appears on the marking. It must be visible at point of purchase.  |  |
| Self-Pressurized Container Labeling for Cosmetics<br>(If Applicable) | 21 CFR 740.11   |                | Shall comply with all applicable requirements  |  |
| Verify Label Claims  | Visual Check  |                | Shall meet label claims (If applicable). Remark any claim that is not verified.  |  |
| Instructions   | Visual Check  |                | Shall include clear and understandable assembly, use, maintenance, care and/or safety instructions as required. In addition, shall be provided in language appropriate to destination countries with no errors or spelling mistakes.   |  |

| <b>PHYSICAL CHARACTERISTICS</b> |                     |                |   |                     |
|---------------------------------|---------------------|----------------|---|---------------------|
| Net Weight<br>(Gm. & Oz)        | Std. Measure        | All<br>Samples | As claimed (Max. +5% / -0%)   | Claimed:<br>Actual: |
| pH Value                        | ASTM D1172-<br>2001 | All<br>Samples | Report actual finding.<br><br><i>Note: Preferred range is 5 to 8.</i> |                     |

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|           |                                     |                |   |  |
|-----------|-------------------------------------|----------------|---|--|
| Fragrance | Organoleptic/<br>Document<br>Review | All<br>Samples | Must comply with claim and conform to IFRA guidelines. <i>Vendor to submit IFRA test report for review.</i> |  |
|-----------|-------------------------------------|----------------|---|--|

### CONSTRUCTION QUALITIES

|                           |  |                |  |  |
|---------------------------|--|----------------|--|--|
| Kohl's Workmanship Review | Visual &<br>Sensory  | All<br>Samples | <ul style="list-style-type: none"> <li>Free from deformation, fracture or other similar surface degradation</li> <li>Free from chips, cracks, dents, blisters, wavy lines and other similar surface imperfection</li> <li>Free from contamination, dirt or foreign matter</li> <li>Free from stain, discoloration or uneven color</li> <li>Free from objectionable odor</li> </ul> |  |
| US Microbead Ban          | Federal Microbead-Free Waters Act of 2015 - CPSD-AN-00843-MTHD | 1              | Applicable to toothpaste, scrub, exfoliating products only<br>The product shall not contain solid plastic particles measuring less than 5mm in size  |  |

### TOXICITY

|   |  |                |  |  |
|---|--|----------------|--|--|
| *Ingredient Review<br><i>(applicable to ALL cosmetics products)</i>                       | FDA<br>21 CFR 73, 74, 81, 82, 250 & 700 to 740 | All<br>Samples | All the colorants and ingredients of cosmetic products must comply with FDA Food, Drug and Cosmetic Regulations.   |  |
| *Ingredient review<br><i>(applicable to cosmetics products sold in California States)</i> | California Safe Cosmetics Act (CSCA)           | All<br>samples | Review the formulation and check whether the ingredients fall into the chemical list of California Safe Cosmetics Act.<br><br>Imported/manufacture may need to report to the authority if there is CSCA substances and if the product meets the reporting rules.                                   |  |
| *Ingredient review<br><i>(applicable for toys-cosmetics products sold in Washington)</i>  | Chemicals of High Concern to Children (CHCC)   | All<br>samples | Review the formulation and check whether the ingredients fall into list of Chemicals of High Concern to Children.<br><br>Imported/manufacture may need to report to the authority if there is CHCC substances and if the product meets the reporting rules.  |  |
| *Toxicological Risk Assessment (TRA)<br>On The Formulation                                | Document<br>Review                             | All<br>samples | Evaluate the safety of the product by a toxicologist. Review the hazard, exposure and risk associated with the ingredient (Federal Hazardous Substances Act, 16 CFR 1500.3)<br><br><i>Vendor can submit a 3rd party test report for review if it is within two years of the report issue date.</i> |  |
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|   |  |          |                     |  |
|---|--|----------|---------------------|--|
| *Skin Irritation (In-vitro)<br><i>(Applicable if Material Documentation is Not Available for TRA)</i> | ECVAM<br>OR<br>US TRA [16 CFR 1500.3 (b)(5) & 1500.3(b)(7)-(9)] covers 16 CFR 1500.3 | 1 sample | No skin irritation. |  |
|---|--|----------|---------------------|--|

| <b>Performance Test</b>                         |                                  |          |   |  |
|---|----------------------------------|----------|---|--|
| * Cyclic Test (For operable component)          | Actual Use                       | 1 sample | Operable component shall withstand 100 times actual use cycles without failure or loss of functionality   |  |
| * Drop Test (For non-fragile items)             | ASTM F963 Clause 8.7.1 Drop Test | 1 sample | No breakage or separation after 4 drops from 3 feet onto vinyl-tiled concrete floor.  |  |
| Leakage Test for Container Filled with Cosmetic | Visual Check                     | 1 sample | The cap is hand-tightened and the container with cosmetic is put upside down. No leakage shall be observed after 2 hours.   |  |
| * Resistance to Corrosion (For metal component) | ASTM B117                        | 1 sample | Metal component shall withstand 24 hours in 5% salt spray (fog) with no major corrosion or visual change.   |  |
| *Cleaning Performance                           | Actual Use                       | 1 Sample | Product exhibit good cleaning performance, and no surface damage when used on the intended surface(s). Product does not leave excessive residue after cleaning performance test |  |

| <b>STABILITY</b>  |              |          |  |  |
|---|--------------|----------|--|--|
| *Photo Stability<br><i>(Applicable To Products with Transparent Container or Packaging)</i> | Visual Check | 1 Sample | Exposure under 450W Xeon lamp or lamp using ICH Guideline for 24 hrs.<br><br><i>Generally accepted industrial requirement: No observable change of sample against the control. For any surface color change it should be class 3.0 minimum (AATCC grey scale).</i> |  |
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|                              |                                     |           |  |  |
|------------------------------|-------------------------------------|-----------|--|--|
| *Accelerated Stability Study | Test according to Cosmetic Category | 6 Samples | <p>Study the following test parameters at t=0 &amp; 14th days @40° C/75% R.H.</p> <p><u>For Soap Bar</u></p> <ul style="list-style-type: none"> <li>- Appearance</li> <li>- Odor</li> <li>- pH</li> <li>- Net weight</li> <li>- Total bacterial count</li> <li>- Total combined molds &amp; yeast count</li> </ul> <p><u>For Packaging</u></p> <ul style="list-style-type: none"> <li>- Appearance</li> </ul> <p><i>Generally accepted industrial requirement:<br/>No observable change of sample against the control.</i></p> |  |
|------------------------------|-------------------------------------|-----------|--|--|

| <b>ANALYTICAL</b>                                     |  |                            |   |  |
|---|--|----------------------------|---|--|
| *Heavy Metal Contamination<br>(Lead And Mercury)      | EPA SW 846 Method# 3050B/3051A/ 3052 (Mod)                   | 1 sample                   | <p>Lead: Less than 10 ppm<br/>(State of California, County of Alameda, Court Case No. H217587 [consolidated with 01-032306])</p> <p>Mercury: Less than 1 ppm<br/>(FDA – 21 CFR 700.13)</p>  |  |
| *Lead In Scrapable Surface Coating<br>(If Applicable) | CPSC-CH-E1003-09   | 1 sample                   | ≤90ppm (0.09% by weight)  |  |
| *1,4 Dioxane  | Head Space Gas Chromatographic – Mass Spectrometric Analysis | 1 sample                   | <p>Report actual finding.</p> <p><i>Note: 10 ppm as an industrial guideline.</i></p>  |  |
| *Cocamide DEA   | Ingredient Review  | 1 sample and questionnaire | <p>Report actual finding.</p> <p>CA Prop 65</p> <p>Product containing cocamide DEA (cocamide diethanolamine / cocamide diethanolamine condensate) shall not be manufactured, distributed, sold or offered for sale provided that cocamide DEA is an intentionally added ingredient in the product and/or part of the product formulation.</p> |  |

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| * Free Formaldehyde Content | HPLC-DAD analysis | 1 sample | Report actual finding.<br><br>Minnesota State Law<br>For product used by children under 8<br><br>Aug 2014<br>Ban of selling children's product by manufacturers and wholesalers that intentionally contain formaldehyde or chemical that under normal conditions would degrade to release formaldehyde<br><br>Aug 2015<br>Ban of selling children's product by retailers that intentionally contain formaldehyde or chemical that under normal conditions would degrade to release formaldehyde |   |

| MICROBIOLOGICAL  |                 |          |   |   |  |
|--|-----------------|----------|---|---|--|
| *Microbial Contamination<br>(Total Bacterial Count , Total Combined Molds & Yeast Count, E.coli) | USP <61> & <62> | 1 sample | Microbial   | Limit Value   |  |
|  |                 |          | Total viable count for aerobic mesophyllic micro-organism | ≤200 cfu/g for baby/eye area products;<br><br>≤2,000 cfu/g for non-baby/eye area products |  |
| *Microbial Contamination<br>(Additional pathogens)   | USP<62>         | 1 sample | Escherichia coli  | Absent/ g   |  |
|  |                 |          | Staphylococcus aureus                                     | Absent/ g   |  |
|  |                 |          | Pseudomonas aeruginosa                                    | Absent/ g   |  |
|  |                 |          | Candida albicans  | Absent/ g   |  |

**PRICING AND ADDITIONAL NOTE:**

\*\* Please consult your nearest laboratory for details.

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| Protocol Version | Description of Change  | Revised by / Date                | Approved by / Date                       |
|------------------|--|----------------------------------|--|
| 500- A           | Initial Release  | Simon Leung<br>April 1, 2010     | Ro Jain<br>April 1, 2010                 |
| 500- B           | Price adjustment on Ingredient Review (per additional color ) & Toxicological Risk Assessment (per additional color)<br>Updated lead content pricing | Candy Chan<br>Jul 30, 2014       | Jeetendra Shelatkar<br>Aug. 4, 2014      |
| 500- C           | Addition of test lines of Free Formaldehyde and Cocamide DEA   | Queenie Tse<br>Apr 21, 2015      |  |
| 500 - C          | Updated Test Protocol  | Dana Leair<br>August 14th, 2015  | Jeetendra Shelatkar<br>August 14th, 2015 |
| 500- D           | Test Method Change to Cocamide DEA, Ingredient Review  | Dana Leair,<br>January 12, 2016  | Jeetendra Shelatkar,<br>January 12, 2016 |
| 500-E            | Addition of Ingredient review according to CSCA and CHCC   | Queenie Tse<br>May 25, 2016      | Jeetendra Shelatkar<br>May 25, 2016      |
| 500-F            | Update of Microbial Limit  | Queenie Tse<br>July 20, 2018     | Teana Robinette<br>July 30, 2018         |
| 500-G            | Add Microbead Free Waters Act of 2015  | Teana Robinette<br>Sept 21, 2018 | Teana Robinette Sept 21, 2018            |
|                  |  |                                  |  |
|                  |  |                                  |  |
|                  |  |                                  |  |