



October 2020

## **Private and Licensed Brand General Certificate of Conformity (GCC) and Children's Product Certificate Requirements**

Kohl's requires all of our vendors to remain informed about and fully comply with existing laws and regulations that impact products produced for our company. Kohl's also mandates on-going monitoring of legislative changes from our vendors to assure all product is produced in full compliance with all applicable legal and regulatory requirements.

The Consumer Product Safety Improvement Act (CPSIA) overhauled the national product safety system and imposed a number of new product safety requirements on product manufacturers, distributors, private labelers and retailers. Due to the requirements set forth in the CPSIA, in July of 2009, we implemented and communicated several new requirements for vendors supplying Kohl's with private and/or licensed brand product. One of those requirements was to mandate a General Certificate of Conformity or a Children's Product Certificate (collectively GCC) be submitted to and approved by Kohl's prior to shipment.

Kohl's GCC requirements **MUST** be met in order to obtain product approval. Specifically, a GCC **MUST** be submitted to and approved by Kohl's prior to shipment.

### **GCC Compliance Audits**

In an effort to provide the due diligence necessary to assure compliance to our product safety policies, we have implemented an enhanced audit process. Audits will include all private and/or licensed brand styles shipped to Kohl's. Each style will be cross-referenced in our central database to verify that both, a passing product test report and GCC, have been provided and are on file with Kohl's. Styles failing to comply with these requirements are subject to fines and penalties.

### **GCC Non-Compliance Policy**

As of February 1, 2015 Kohl's implemented a renewed and enhanced GCC non-compliance and enforcement policy. The enforcement policy is a tiered approach intended to provide added communication and support to our vendors prior to taking any remedial action regarding non-compliant product. The following details Kohl's tiered approach to GCC non-compliance:

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## GCC Non-Compliance Fines and Penalties

First offense	Written warning; explanation of non-compliance noted and remedial action required from vendor
Second offense	Written explanation of non-compliance noted, a fine of \$5,000 per style per incident(s) noted and remedial action required from vendor.
Third offense	Written explanation of non-compliance noted, a fine of \$10,000 per style per incident(s) noted or removal from all point of sale channels.

In addition to ensuring compliance with CPSIA, this policy will also ensure compliance with Kohl's Merchandise Purchase Order Terms & Conditions, which provide, in part, "Your failure to provide any documents, certificates, warranties or laboratory results, which we request to verify or warrant your compliance with Applicable Law, shall be deemed to be a material breach of the terms and conditions of our Purchase Order."

If you have questions or concerns with the requirements or process for submitting a GCC for Kohl's approval, please review the materials previously distributed and available on K-Link, Kohl's vendor portal. Materials are located under the "Legal" tab in the portal and a copy of this document is also available via the portal for your reference as well. Additional questions may be directed to [Kohl's Product Integrity mr.qa.pi@kohls.com](mailto:Kohl's Product Integrity mr.qa.pi@kohls.com).

Kohl's has made consumer product safety one of our highest priorities! It is only with your support that Kohl's can assure that the products we sell meet our standards and all applicable legal and regulatory requirements.

Thank you for your continued partnership and support and for helping us offer "Amazing Product" that is safe and a great value for our Kohl's customers.