

Hardlines & Footwear

Testing Manual

September 2023

Kohls Testing Program Hardlines & Footwear

1.) INTRODUCTION

- **When?** The Kohl's Hardlines & Footwear Testing Manual has been updated and will impact all products that will be shipping for and after Fall 2018 and beyond
- Who? All Kohl's private & exclusive brands merchandise agents, suppliers, vendor, manufacturers & testing laboratories are expected to adhere to applicable requirements stated in this manual. This manual is subject to updates & revisions, as needed, and Kohl's will communicate changes to all parties. Kohl's Approved 3rd Party Testing Laboratories are designated to perform product testing on all private & exclusive brand products, this step is initiated by the vendor/supplier.
- **What?** Kohl's requires pre-shipment testing of samples randomly selected, and reflective of bulk production quality, on all private & exclusive brand products
- **How?** Appropriate party is required to submit required number of bulk production quality samples to the testing laboratory, approved by Kohl's, along with completed Kohl's Test Request Form
- Where? Specific laboratory locations are listed on the K Link Website

2.) TESTING PROGRAM GOALS

The Kohl's Testing Program has been set-up to ensure that all private and exclusive brand products meet the company's expectation 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 compliant with the requirements outlined in this chapter. If a vendor is not able to meet Kohl's Testing standards, it is the responsibility of the vendor to notify Kohl's prior to an order being shipped. Kohl's Testing Program is for the benefit of Kohl's and does not replace the vendor's own quality assurance program.

In order to accomplish the above objective, Kohl's has contracted with third party laboratory testing service providers to conduct product evaluation and testing on behalf of Kohl's. Kohl's will only accept test results issued by the laboratories approved by Kohl's. Additional details on laboratory locations, contact information etc can be found on K Link website.

Kohl's requires vendors to stay up-to-date on the laws that govern the sale of hardlines/footwear 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's Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)
- Hazardous Substances and Articles, 16 CFR Part 1500
- Ban of Lead-Containing Paint, 16 CFR Part 1303
- 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

In most cases testing will include, but not limited to:

Safety - Could the product cause illness or injury in normal use or in foreseeable abuse? Kohl's refers to product recalls of the U.S. Consumer Product Safety Commission (found under CPSC.gov).

Instructions - Are they easy to understand and carry out? Are they accurate? What is common U.S. industry practice?

Packaging - Does it provide all necessary information? Does it comply with labeling regulations? Does it adequately protect the product?

Actual Use - Will it accomplish satisfactorily the purpose for which it is intended by providing good performance characteristics and durability?

Standards - The U.S. government has issued regulations covering many of Kohl's hardlines products. In addition to federal, state and local government regulations, Kohl's will research all applicable industry standards, available studies and/or market conditions in order to establish practical end-use test standards.

TESTING PROGRAM DETAILS

WHEN?

Vendors are to submit test samples randomly selected representative of bulk production. Test samples should be selected from early production in order to help ensure testing can be completed before shipment. The goal of the Testing Program is to have all testing complete and approved by Kohl's 30 days prior to x-factory, however it is recommended to begin testing as soon as top of production is available.

Products must be submitted to the laboratory and receive a passing test report with enough time for corrective action should any problems be found during product testing. It is the vendor's responsibility to ensure enough time has been scheduled.

HOW OFTEN?

Adult products must be tested every 12 months (or 150,000 units per style/color) regardless of the quantity ordered (including test or new store orders), or when changes are made in production i.e. change in factory producing product, change in material etc. **Exception: All new colors must go through testing.

All children's products must be tested every 6 months (or 100,000 units per style/color) - whichever comes first.

Kohl's has implemented a 2 tiered approach towards product testing. All products must meet the minimum Product Integrity standard for tier I. However, should business needs necessitate elevated quality levels for any particular brand or style, the option exists of selecting tier 2 standards. Decision on whether a product needs to meet tier 2 standard must be made by Kohl's PD team and communicated to the vendor at the time or writing objectives or prior to order placement.

WHERE?

Test samples may be forwarded to the nearest laboratory authorized by Kohl's. Please refer to the K-Link for details on laboratory locations, and other relevant contact information.

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.

WHAT?

The required number of samples must be sent for testing. If the laboratory does not receive the correct number of samples, testing will be put on hold. The minimum number of samples required for testing is obtained by contacting the laboratory directly.

In addition, completed Kohl's Test Request Form must accompany all samples submitted to the laboratory. Testing will not commence without completed Test Request Form and/or sufficient samples for testing. It is the vendor's responsibility to complete the Test Request Form as accurate as possible, wrong information will result in delay of test results. Should the laboratory not receive the required number of samples for testing or an incomplete Test Request Form, testing will be put on hold. The laboratory will make one attempt to contact the party that submitted the item for testing for the outstanding information. Should the party that submitted the item for testing, and delete the open work order from their system after 30 working days. Vendors should note that they must use the Kohl's assigned style number when submitting for testing, not any internal style numbers.

What Do I Need To Send For Testing?

Testing Submit Checklist			
	TRF (Test Request Form)		
	Correct # of Samples (Per Protocol)		
	Packaging/Hangtags or CAD work		
	Manuals/Instructions (if applicable)		
	Warning Labels (if applicable)		
	Certification (UL, FCC, Etc Listings, if applicable)		
	Adult Tracking Label		
	Children's Tracking Label (if applicable)		

Fiber Content Labeling (Recycled cotton, recycled poly, organic, Tencel[™] Lyocel, etc.)

If submitting a product for testing that contains sustainable or trademarked content (i.e. Recycled cotton, poly, organic, Tencel[™] Lyocell etc), vendor must provide the proper certificate to be attached to the testing report.

If certificate is PROVIDED at the time of testing:

- Fiber content claim is to be marked: Content claim is recommended only based on the certificate provided and not by actual testing
- Fiber content will be marked at PASSED, once fiber content is tested and verified
- Certificate is attached at end of testing report

If certificate is NOT PROVIDED at the time of testing:

• Fiber content should be marked as a FAILURE

Please familiarize yourself with the Speciality Fibers SOP available on K-Link for more information.

Assembled & Unassembled Furniture:

The following information should be included at the time of testing for all furniture items:

Fit Approval Tech Spec to verify product dimensions

- Tech Pack MUST be submitted along with testing samples to submit for lab testing.
- Tech Pack MUST be in Fit Approved Status in order to submit for testing. Test lab should not complete testing without a FIT APPROVED Tech Pack. Fit Approved Tech Pack will include:
 - o Assembly Instructions (if applicable)
 - o Overall Dimensions
 - o Product net weight
 - o Product minimum weight claim



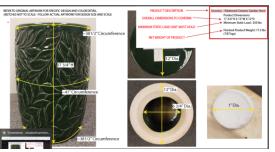
- Lab will measure testing samples against product dimensions specified in Tech Pack.
- The tolerance for overall product dimension claims (L x W x H) is monitored by the Technical Design team. Information regarding this can be found on K Link
 - Resources > Performance Testing >Global Technical Design > Home Hardlines > Policies and Procedures > Furniture Tolerances Table

Bill of Material (BOM)

• BOM will be included in the Tech Pack

Assembly instruction (AI)

- Al instructions will be included in the Tech Pack and verified by the lab if applicable
- If the AI is not found in the FIT APPROVED tech pack then AI is not applicable **Packaging/Labeling/Claims**
 - Packaging labeling and claims must be included at the time of testing for all furniture items
 - Ecomm products with no packaging should include: Overall dimensions, minimum weight and net weight claim be present in Tech Pack. Should also include CAD work or carton packaging that item will be shipped in. Ecomm only items still must include: Distributors name, trademark, or other means of identification, Product Identification, Net Quantity and Country of Origin (GS1-128 if applicable)



EXAMPLE OF DIMENSIONS IN TECH PACK

• If there are any additional claims made on the product these must be included on the TRF at the time of testing

Tip Kit Requirements:

• Tip kits are required for furniture items that are 27" or taller for all clothes storage and storage units, this includes any additional styles that are noted in the tech pack and/or BOM that requires a tip kip. If any questions ask Kohl's Product Integrity or Tech Design teams.

COST ASSOCIATED WITH PRODUCT 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.

Laboratories will bill the vendor directly for the testing charges. Vendors are required to work with the laboratories directly to set-up accounts, establish terms of engagement for conducting business. All costing is negotiated between the vendor and the laboratory directly.

ONCE PRODUCT ARRIVES AT THE LABORATORY:

All samples received by the laboratory are tested in accordance with the established Kohl's Test Protocol. In the rare instance, if at the time samples are received and Kohl's test protocol does not exist for that particular product, the laboratory will pursue a Test Protocol with Kohl's. Additional time may be required to research and develop a suitable test protocol approved by Kohl's.

Kohl's testing protocols may vary by each individual product/style. More than one test protocol may be applicable (i.e. a candle holder with intended after use as a coffee mug).

Applicable Test Protocols are subject to change if the product varies from the initial product for which the Test Protocol was developed. Upon receipt of actual samples, it is at the laboratory's discretion to determine which, if any, additional tests are necessary.

Laboratories make every effort to evaluate products in the shortest time possible. Under normal circumstances, products will be evaluated according to the basic testing packages (protocols) within five working days (not including the day the sample is received). In the case of comparison testing, products will be evaluated in accordance with the basic testing packages (protocols) within ten working days (not including the day the sample is received).

Under certain circumstances it may not be possible to complete testing on an item within the established five working days due to conditions inherent to specific test requests (i.e. a request for extended environmental testing of 500 hours) or the product itself (i.e. candles that burn for 200

Reviewing Test Reports

The reports are reviewed as follows by Kohl's Hardlines Product Testing Analysts.

- 1. <u>Pass</u>
 - Reports are received in OnePLM.
 - Comments will not be issued for passing reports
- 2. <u>Fail</u>
 - Marginal failures that are "accepted as is" Notifications will be sent to Agent/Vendor. Reports are filed.

- Failures that do not meet marginal guidelines are reviewed with recommended resolution and assigned "Retest" status. Notification is sent to Agent/Vendor. Product must be corrected and submitted to approved labs for re-testing within 5 working days.
- Turn around time for comments on testing reports is 2-3 Max business days. During the peak season the turnaround time may exceed this amount.
- If the photograph does not show the cause of failure clearly enough, the actual failed samples must be sent to Kohl's as soon as possible after testing by the Agent or Vender upon Kohl's request to one of the following address:

Menomonee Falls Office:

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

 Products that fail testing due to regulatory/product safety requirements must be immediately corrected by the vendor and resubmitted to approved labs. Products that do not meet Federal or State regulatory/product safety requirements cannot be shipped to Kohl's Department Stores.

When vendors are asked to resubmit their product for retesting it is required that the vendor includes a signed improvement letter to the testing lab indicating exactly what was changed on the product to improve it. This should include any material changes, structural changes, etc. This will help ensure that the testing lab knows exactly what needs to be retested and will help the Kohl's testing team be able to make their final decisions. This needs to be completed for ALL products that are submitted for retesting regardless of how minimal the failure is.

Final Packaging – All packaging must be submitted at the time of testing. If the final packaging isn't ready at the time of testing, the vendor/supplier can submit CAD or artwork.

All Kohl's products MUST include the following information on their packaging per the FPLA/UPLR requirements. This includes the Distributor's name and address (city, state & zip)

Review 16 CFR 500 Samples information: & 19 CFR 134 • Distributor's name, trademark or other means of identification of the		
 State & Zip) Product identification Net quantity of the contents in terms of weight, measure or numerical count (Metric & US Standard) or a combination so as to give accurate information and facilitate value comparison by the consumer (if applicable) Country of origin (If imported) 	16 CFR 500 &	 Distributor's name, trademark or other means of identification of the manufacturer or packer & address (City, State & Zip) Product identification Net quantity of the contents in terms of weight, measure or numerical count (Metric & US Standard) or a combination so as to give accurate information and facilitate value comparison by the consumer (if applicable)

Safety and Regulatory Requirements

Effective for Fall 2012 all Kohl's private & exclusive brands for the following items but not limited to: wallets, handbags, clutches, and totes, belts, footwear, jewelry, key holders, key chains, key caps, luggage tags, ID cases, bag charms, zipper pulls, eyeglass cases, coverings/cases for mobile electronic devices, coverings for journal/address book/photo albums, cosmetic cases/bags and toiletry cases/bags will be tested for phthalates in order to meet the requirements set by California Prop 65. Phthalates testing applies to accessible plasticized component parts which are PVC or other soft plastic, vinyl or synthetic leather only.

High Risk Materials that may contain phthalates:

- Polyvinyl chloride (PVC) and related polymers such as polyvinylidene chloride (PVDC) and polyvinyl acetate (PVA)
- Soft of flexible plastics and rubbers, except polyolefins, silicone rubber and natural latex
- Foam rubber or foam plastic, such as polyurethane (PU)
- Surface coating, non-clip coatings, finishes, decals, and printed designs
- Adhesives and sealants

Labeling

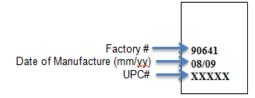
Adult Tracking Label:

Kohl's will require all Kohl's private and licensed brand Adult products to contain a label that includes the manufacturer's factory number and the month and year the product was manufactured. Kohl's expects this information to be laid out in the following order on the existing UPC label or sewn in label:

Kohl's Assigned Factory Number Manufacture Date (Month/Year) UPC

If both factory # and date don't fit it is ok to only use Month/Year **If space limitations exist, contact Kohl's Quality Assurance & Product Integrity teams to discuss minimum required information (<u>quality.assurance@kohls.com</u>).

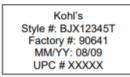
EXAMPLE (for quality tracking purposes):



- For Products being produced for the Fila outlets we are making a change to what is required on the tracking label. See the examples to the right.
- We are going to make a rolling change to add a description in front of the numbers that are listed on the tracking number

Tracking Label updates Examples:

Kohl's Dept Stores



Children's Tracking Label:

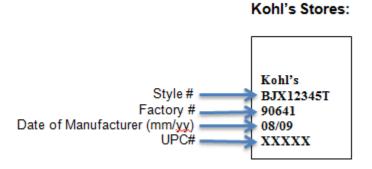
Kohl's requires all Kohl's private and licensed brand **children's products** to contain a permanent marking that includes "Kohl's", the product style number or name, the manufacturer's factory number and the month and year the product was manufactured. This shall be permanently and distinguishably marked on the product. Kohl's expects this information to be laid out in the following order:

Kohl's Style No. OR Style Name Kohl's Assigned Factory Number Manufacture Date (Month/Year) UPC #

In the event that a vendor discovers challenges in attaching the required permanent tracking label to any particular product(s) and/or a vendor believes that this type of labeling is not practical for any particular product(s), the relevant Kohl's Product Manager should immediately be contacted. It is Kohl's expectation that, in any such event, the vendor will provide suggested corrective actions.

It is important to note that the required Factory Number is a unique; Kohl's supplied factory identification number. It is not the Vendor Number. While all factories used to produce Kohl's merchandise should be well aware of their Kohl's-assigned Factory Number, requests for confirmation of Factory Numbers can be directed to Kohl's Corporate Governance/Factory Compliance team – Attention: <u>Socialcompliance@kohls.com</u>.

EXAMPLE (for quality tracking purposes):



Flammability:

Flame Retardant Chemicals:

Kohl's manufactured products must NOT contain any flame retardant chemicals.

Flammability Standards for Home Products

Please refer to the testing protocol section for specifics on flammability requirements by product, testing methodology and Kohl's standards. When applicable, flammability testing is mandatory and must be conducted in every colorway.

Wool Products Labeling Act:

The Wool Products Labeling Act, 16 CFR 300, is a law that requires all products containing any amount of wool to be labeled. This Act works in conjunction with the Textile Fiber Products Identification Act. The Wool Act differs from the Textile Act in that all wool products must be labeled, including hats. The Wool Act does not provide any tolerance for the content of wool products. For practical purposes, the Commission will apply the three percent tolerance allowed for other textile products to wool products. The tolerance will not apply if the label indicates that the product is entirely wool, e.g. 100% wool, 100% cashmere, all wool or all cashmere. The percentage of wool must always be stated and identified by its generic name, even if it is less than 5%. The Wool Act applies to hair and fleece that is not attached to a skin. Products made from hair or fleece attached to skin are covered by the Fur Rules.

Country of Origin

The country of origin is required to be on the label.

Example: Made in Hong Kong

- Imported products must identify the country where they were processed or manufactured.
- Products made entirely in the USA of materials also made in the USA must be labeled "Made in U.S.A."
- Products made in the USA of imported materials must be labeled to show the processing or manufacturing that takes place in the USA as well as the imported component.

Example: Made in U.S.A of Imported Fabric

• Products manufactured in part in the USA and in part abroad must identify both aspects.

Example: Made in Hong Kong Finished in U.S.A

Small Parts/Choking Hazard Label:

Products which have a child play value or child appeal must have the appropriate cautionary or statement label if the product includes a small part as per 16 CFR 1501 and 1500.50, 51, 52 and 16 C.F.R. 1500.18(a) (9). This regulation prevents deaths and injuries to children under three from choking on, inhaling, or swallowing small objects they may "mouth". The following guidelines for the warning label must be followed: 1) Safety labeling shall consist of an alert symbol (an exclamation mark within an equilateral triangle), a signal word (CAUTION or WARNING), and text that describe the hazard that is present. 2) The signal word WARNING shall be used to indicate a potential hazard. 3) The signal word shall be in all uppercase sans serif letters not less than 1/8 inch (3.2 mm) in height and shall be center of left aligned. 4) The height of the triangle shall be at least the same height as the signal word. 5) The height of the exclamation point shall be at least half the height of the triangle and shall be centered vertically in the triangle. 6) Text describing the hazard and hazard avoidance behavior shall be appeared in sans serif lettering and shall be either left aligned or center justified. Capital letters shall be no less than 1/16 inch (1.6 mm.). Where possible, such text should begin on the next line below the signal word, and that a new line should be used for each subsequent statement or separate thought.

CHOKING HAZARD - Small parts Not for children under 3 years.

Not a toy. For decorative purposes only.

For more information on Small Parts Warning Label please refer to 16 CFR 1501 and 1500.50, 51, 52 and 16 C.F.R. 1500.18(a) (9).

Additional Colorway Testing

If you may be eligible to have your product(s) undergo additional colorway testing. In order to be eligible your product(s) must have the same construction/materials/fiber content, etc. In order to do this, you will need prior approval from the Kohl's Product Integrity team. The tests that would be including for additional colorway are the following:

- Labeling/Packaging
- Country of Origin Marking
- Verify Label Claims
- Adult Tracking Label
- Import Permit (if applicable)
- Colorfastness (if applicable)
 - o Crocking
 - o Light
 - o Chlorine/Non-Chlorine Bleach
 - o Water
- Analytical
 - o Lead (scrapable surface)
 - CA Prop 65 (if applicable)

Use of disappearing "Magic Pens" is prohibited

Magic pens are commonly used to mark the position of cut parts for accurate sewing. Markings disappear with steaming, pressing, and/or washing, only to reappear when subjected to freezing temperatures, rendering the production defective during transit from the factory.

We are prohibiting the use of Magic pens/markers for any Kohl's product effective immediately (3/2022) without exception. There are alternatives to magic pens, such as water-soluble chalk or templates that can be considered.

Use of metallic in foodware/drinkware items is prohibited

The use of metallic in foodware/drinkware is not allowed. Since there is a possibility of these types of items to be used in the microwave, this becomes a safety concern. Serveware with metallic finishing must be run through Kohl's QA/PI to see if suitable or if adjustments are needed. Any item that deemed acceptable would need a permanent warning label that microwave use is not appropriate. For products that will be online, they will also need to be marked / labeled appropriately.

We are prohibiting the use of metallic in any foodware/drinkware for any Kohl's private and exclusive brands, effective immediately (September 2023) without exception. Please reach out to Kohl's QA/PI (quality.assurance@kohls.com) team with any questions or concerns.

Footwear Testing Standard Operating Procedure (SOP)

In order to ensure product quality, reliability and safety, all private & exclusive branded materials and whole shoes that are representative of <u>production quality</u> are required to be tested. Samples must be selected from early production in order to help ensure testing is completed before shipment.

It is the vendor's responsibility to ensure that the minimum required number of samples indicated on each test protocol is submitted to the Laboratory for testing. If the laboratory does not receive the minimum number of samples, testing will be put on hold. Along with the samples, a <u>completed</u> Test Request Form & Bill of Materials (B.O.M.) (enclosed in this package) with accurate information must be submitted to the laboratory.

We require our vendors to submit test samples to the Laboratory from early production run, so that there is enough time for <u>corrective action</u> should any problems occur during testing.

Once testing is complete, the Laboratory will upload the testing report into the OnePLM system. Kohl's Product Integrity will review the test reports and comment on failures.

Additional tests may be conducted on certain products depending on material content, shape, size or end use. Laboratory will determine if there will be a need for additional testing. The financial responsibility of all fees associated with testing is the vendor's.

Materials Testing

It is the vendor's responsibility to ensure that Kohl's Product Integrity has received a passed test report from Laboratory, <u>15 weeks</u> prior to the first ex-factory date. Laboratory will apply Test Protocol # 1203 for material testing.

Whole Shoe Testing

30 days prior to the first ex-factory date, Kohl's Product Integrity must have received a passed test report from the Laboratory. Whole shoe testing will be conducted using Test Protocol # 1204.

Composite Testing

As per Kohls Testing Policy, the testing lab may conduct composite testing in surface coating up to a maximum of 3 colors with an 80% safety factor applied, and assign "pass" or "fail" criteria based on the number of colors in the composite (i.e. 1 color – standard 90ppm, however if 2 colors are in the composite the safety factor is applied and the standard will be 36ppm (72/2) and if 3 colors are in the composite – the standard will be 24ppm (72/3). If the composite test results are greater than or equal to 24ppm, then individual paint coating may fail the lead in paint limit, and further confirmation testing is required to check if the individual paint would fulfill the lead in paint limit or not.

Grouping

To help try to reduce the cost of testing, Kohls will allow grouping of same materials/trim/hardware etc. that has the same color and or finish used on multiple styles or multiple colorways within a style. Grouping is limited to a maximum of 3 styles that have the same materials & all colorways within any given style.

When submitting for grouping vendors/suppliers **MUST** make sure that all styles and colorways that you are intending to submit for grouping are sent all at the same time. The lab will not conduct group testing on products not submitted together.

If a failure arises within group testing it is in Kohls discretion to decide on a case by case basis if these items would need to be retested on an individual basis or can be resubmitted for group testing

Grouping Materials Testing

Group to 3 styles max that have common materials/components (i.e. metal stud in flower)



Grouping different styles with common components

Same outsole and upper material







Grouping different styles with common components

Same liner used in all 3



Test Order – April



Additional Colors - June



Fashion Jewelry Testing Standard Operating Procedure (SOP)

Introduction:

The Kohl's Fashion Jewelry Testing program has been in effect since January 1, 2007. All items of Fashion Jewelry must be tested on bulk quality samples, prior to shipment. Vendors must submit production samples to Kohl's approved 3rd party independent testing laboratory, and receive a passing test report. It is the vendor's responsibility to ensure enough time has been scheduled for corrective action should any deficiency be found during laboratory testing.

Test samples should be selected from early production in order to help ensure testing can be completed before shipment. The required number of production samples must be sent for testing. If the laboratory does not receive the correct number of samples, testing will be put on hold. Laboratory will notify Kohl's that testing is on hold if the matter cannot be resolved by the vendor after 30 working days. The required minimum number of samples is indicated at the back of Kohl's Test Protocol or can be obtained by contacting the laboratory directly.

All samples received by the laboratory are tested in accordance with the established Kohl's Test Protocol. Applicable Test Protocol is subject to change if the product varies from the initial design for which the Test Protocol was developed. Upon receipt of actual samples, it is at the laboratory's discretion to determine which, if any, additional tests are necessary.

Testing Criteria

- (a) New Order every buying season.
- (b) Grouping Principle on Lead Content Testing (See Examples 1-3)

The criteria's are:

- Grouping principle could be applied to a group of fashion jewelry that are of the same design theme i.e. a necklace and bracelet made from the same material. Each of this fashion jewelry carries a unique style number AND marketed under an identical private brand.
- Items must all come from the same Country of Origin
- Vendors can select to make a material declaration that some or all of the associated components or parts in a group of fashion jewelry were manufactured from the same source of material.
- Vendors should make the material declaration on the designated section of the Fashion Jewelry Test Request Form
- Laboratory, upon receipt of the complete Fashion Jewelry Test Request Form, will accept the material declaration "as is" and conduct a one-time testing to determine the lead content of this material. Laboratory, acts in good faith, will apply the one-time test result of this material to cover all style numbers declared by the vendor.
- Vendors may group up to a **maximum of 8** items on one report per submission.
- One test report will be issued to cover all grouped styles.

Grouping Principle on Lead Content Testing

Example 1



Plastic chain link, plastic beads and the large metal beads are made of the same material

Grouping Principle on Lead Content Testing





Plastic and some of the metal components are made of the same material

Grouping Principle on Lead Content Testing

Example 3



Earrings and pendant are made of the same material

Handbag/Wallet/Evening Purse/Tote Bag Etc. Testing Standard Operating Procedures (SOP)

Fiber Content Labeling:

Handbags & small leather goods made of Polyurethane, fiber content labeling should be labeled as; **Imitation Leather**

Shell: XXX Lining: XXX

If the handbag is leather then must disclose on fiber content.

Group Testing:

To help try to reduce the cost of testing, Kohl's will allow grouping of same materials/trim/hardware etc. that has the same color and or finish used on multiple styles or multiple colorways within a style. **Grouping is limited to a maximum of 3 styles** that have the same materials & all colorways within any given style.

When submitting for grouping vendors/suppliers **MUST** make sure that all styles and colorways that you are intending to submit for grouping are **sent all at the same time.** The lab will not conduct group testing on products not submitted together.

If a failure arises within group testing it is in Kohl's discretion to decide on a case by case basis if these items would need to be retested on an individual basis or can be resubmitted for group testing.

In case of additional colorways being added later in production, Kohl's will allow these colorways to be added onto previous test report results as long as it falls within 6 months from the date the original report was issued.

Sending Samples for Testing:

In order to facilitate a seamless testing process vendors/suppliers are required to submit the following items for testing:

- Completed TRF for every style
- Completed B.O.M.
- # of samples as listed on protocol
- Payment (if applicable)

Grouping Materials Testing Examples

Grouping 3 styles max that has the same materials used:



Grouping of 1 Style in all Colorways with common hardware/trims/finishes:







Best Case Grouping Scenario Example

3 Styles coming in multiple colorways

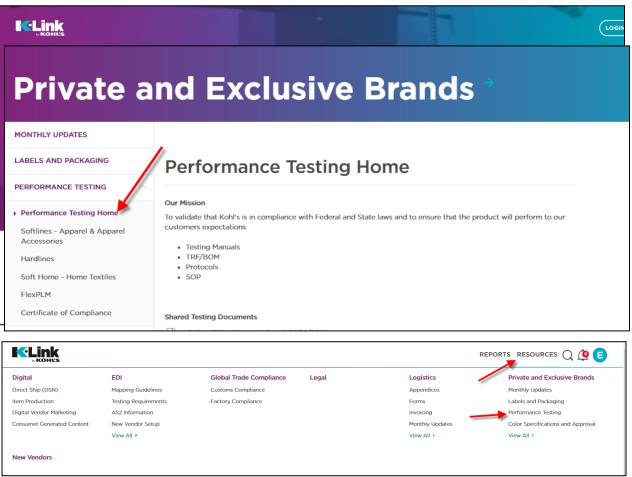








K-LINK: https://link.kohls.com/



Should you have any problems accessing the Private Brands Tab, click on Contact and call our Help Desk at 262-703-1515.

Updates:

3/6/2020: Updated furniture/ecomm only items packaging requirements

5/19: Added flammability testing requirements & flame retardant requirements. Added clarification around lab certification, added requirements for wool labeling, small parts warning and country of origin labeling

7/27/2020: Added tip kit requirements for 27" or higher

8/13/20: Updated the tip kip requirements and updated final packaging requirements to make it mandatory

8/26/2020: Added packaging testing requirements

10/15/2020: Added additional colorway testing option/requirements

3/22/2021 – Added fiber content requirements to handbag SOP

3/2022 - Added magic pen requirements

9/2023 - Added metallic requirements on page 12 and updated format