LABELING GUIDELINES FOR APPAREL AND APPAREL ACCESSORIES

This is an overview of labeling guidelines that are applicable to Kohl's Private & Exclusive Brands for apparel and apparel accessories.

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Overview

This section is an overview of the labeling guidelines as they apply to Kohl's Private & Exclusive Brands apparel and apparel accessories. The requirements outlined below are in conjunction with those mandated by the Federal Trade Commission (FTC) and The Consumer Product Safety Improvement Act of 2008 (CPSIA). All vendors are responsible for ensuring that all Private and Exclusive brand products shipped to Kohl's are in compliance with all applicable laws, rules, guidelines and regulations, as well as Kohl's Department Stores quality standards.

All products which are applicable to these standards must have the following information:

- I. Brand Name/Logo
- II. Size
- III. Fiber Content
- IV. Registered Identification Number
- V. Country of Origin
- VI. Care Instructions
- VII. Mechanics of Labeling
- VIII. Specialty Labeling
- IX. Tracking Labels
- X. Disclaimers and Tags
- XI. Appendix

Products/Categories covered in below requirement:

- o All items of clothing
- Scarves & Handkerchiefs
- o Socks & Hosiery
- o Coated Fabrics
- o Belts & Suspenders (only if content is disclosed on the label)
- o Permanently tacked Neckties (only if content is disclosed on the label)

Additional information may be required on certain specialized products. These include but are not limited to:

- o Down-filled products
- o Wool & Animal Hair products
- o Children's Sleepwear etc.
- o Products containing Faux Fur
- o Hats, caps, etc.

Products/Categories exempt from below requirements:

- o Bags net bags, tote bags, bags for laundry etc.
- o Beads, sequins, buttons
- o Flowers made of fabric

I. Brand Name/Logo

The appropriate brand name must be conspicuous at the point of sale for Kohl's Private and Exclusive brands.

II. Size

The size of the product must be indicated on the permanent content or care label with the exception of children's sleepwear. The size of the garment must be in terms of age in months, or by the child's numeric size.

III. Fiber Content

A. Fiber Content Labeling with Small Trace Amount of Other Fibers:

Option 1:

Traces of fiber that are <u>applied topically</u> to the surface of the fabric, or <u>embedded or impregnated</u> in the fabric, less than 0.5% can be omitted from the content declarations. Lab will include a statement on the report "with trace amounts of other fiber" on the test results. In the "RECOMMENDED FIBER CONTENT" section, the lab will disclose as "Exclusive of Decoration."

Option 2:

Traces of fiber greater than 0.5% must be rounded up to the nearest 1% and be disclosed on the fiber content label.

There is **no tolerance** allowed on products labeled as one fiber (100%).

Example: 100% Cotton Example: 100% Jute

There is a \pm -3% tolerance allowed by weight when two or more fibers are in the product. However for functional fibers i.e. **Spandex, there is only a \pm-2% tolerance allowed.**

Example: Labeled: 65% Polyester Allowed 62% to 68% Polyester

35% Cotton Allowed 38% to 32% Cotton

Example: Labeled: 95% Rayon Allowed 92% to 98% Rayon

5% Spandex Allowed 3% to 7% Spandex

B. Pile Fabrics

The fiber content of the pile and backing should be disclosed separately. If the pile and back are stated separately, the ratio between the two must be given as percentages of the fiber weight of the whole. If pile is made of faux fur, this must be called out in both fabric and garment testing.

Example: Pile: 60% Rayon 40% Nylon

Back: 70% Cotton 30% Rayon (Pile is 60% of fabric and back 40%)

C. Decorative Trim or Ornamentation

Various trims, decorations or ornamentation that are incorporated into clothing and other products are excluded from calling out the fiber content.

Examples of exceptions to fiber content disclosure are listed below:

- Trims collars, cuffs, braiding, waist bands, wrist bands, rick-rack, tape, belting, binding, labels, leg bands, gussets, gores, welts, etc.
- Findings threads, elastics, buttons and other similar products for assembly
- Embellishments beads, sequins, rhinestones, studs and other similar applications
- Decorations decorative trims such as embroidery, overlay, appliqués. Also decorative patterns or designs that are an integral part of the fabric.

In order to call out "Exclusive of Ornamentation", the decoration **must not exceed 15% of the surface area of the product.** If the fiber content of the decoration is not disclosed, the fiber content must be followed by the statement "Exclusive of Decoration."

Example: 100% Cotton, Exclusive of Decoration

Ornamentation – fibers and yarns that are incorporated into the fabric, and do not exceed 5% of the total fabric weight, the term "Exclusive of Ornamentation" must be used in conjunction with the fiber content.

Example: 100% Rayon, Exclusive of Ornamentation

When the decorative trim exceeds 15% of the surface area, or ornamentation exceeds 5% of the fiber weight, the fiber of the decoration or ornamentation must be disclosed.

Example: Body – 100% Rayon
Decoration – 100% Silk

Example: Body – 100% Rayon Ornamentation – 100% Silk

Brand Labels or Logo Labels - Products with brand labels or logo labels do NOT need to be disclosed in the fiber content label as "Exclusive of Decoration".



Figure 1 Brand Label at Waistband



Figure 2 Brand Label at Back Pocket (re



Figure 3 Brand Label at Back Pocket (Brown)

Elastics - Per Kohl's, proceed with Exclusive of Decoration instead of Exclusive of Elastic on the examples given below.

Fiber Content – Exclusive of Trim (elastic)

Examples below will <u>not</u> require the fiber content of the elastic however; it must be disclosed as "Exclusive of Decoration"



Exclusive of **decoration** should be called out on the label.



Exclusive of **decoration** should be called out on the label.



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Exclusive of **decoration** should be called out on the label.

The following examples which have elastic will need to be disclosed as "Exclusive of Decoration":









<u>Socks Exception:</u> If a functional fiber like Spandex is called out, then "Exclusive of Decoration" does NOT need to be included on the label.

EXAMPLES OF LABELING CALL OUTS:

Example 1: If fiber content is called out and includes Spandex, Exclusive of Decoration is not needed.





Example 2: If the sock has an applique, then Exclusive of Decoration is required.





D. Sectional Disclosures

If a product has separate sections with different fiber compositions, the content of each section should be identified separately on the label. If the ornamentation or trim forms a distinct section of the product and is not exempt from fiber disclosure, then its fiber should be disclosed as a separate section. It is permitted to disclose fiber content by color of the section(s); provided the colors are named clearly for customer identification (e.g. "dark purple" rather than designer names such as "plum"). Disclosing by color may simplify a label when there are multiple sections of the sections that are difficult to describe by function.

Example: Body: 100% Cotton Example: Red: 100% Nylon

Sleeve: 80% Cotton 20% Polyester Blue: 100% Cotton

Green: 80% Cotton 20% Nylon Ornamentation: 100% Silk

Per Kohl's, products consisting of two or more items made of the same and/or different fibers (e.g.: ensembles consisting of a skirt and blouse, suit jacket and pants, etc.) each garment or textile product **must** have its own label.

Example: Skirt & Jacket sold as a set

Skirt: 100% Polyester Jacket: 60% Polyester 40% Cotton

E. Bi-constituent or Multi-constituent Fibers

If a manufactured fiber is a mixture of two or more chemically distinct fibers, combined during or before extrusion, the content disclosure should state:

- -Whether it is a bi-constituent or multi-constituent fiber;
- -The generic names of the component fibers, in order by predominance by weight; and
- -The percentage of each component by weight

Example: 100% Bi-constituent Fiber (65% Nylon, 35% Polyester)

F. Products Containing Linings, Interlinings, Filling and Padding

Per Kohl's, products with lining (only applicable if it has a functional purpose), interlining, filling or padding incorporated, the fiber content must be disclosed. This is also applicable to swim wear items.

If body/base fabric and lining or interlinings are made of the same material, the fiber content will need to be disclosed separately.

Example: Shell: 100% Polyester Lining: 100% Polyester

G. Real Fur & Faux Fur Labeling

On August 15th, 2007, the New York state governor signed a Fur Labeling Bill. This bill requires that all apparel sold in the state of New York which contain either real or faux fur, be labeled with the terms "Real Fur" or "Faux Fur." This applies to all items of apparel, apparel accessories (gloves, scarves, etc.) and footwear, regardless of the quantity of real or faux fur used and price value on the end product.

Kohl's Policy on Faux Fur:

Kohl's does not allow the use of Real Fur in any of our private and exclusive brand products. The use of faux fur is permitted. The faux fur material used MUST meet all criteria outlined in the Kohl's Product Safety and Labeling Guidelines for Apparel Products.

Definitions under the New York State Law of Real and Faux Fur:

- "Real Fur" shall mean animal skin or part thereof with hair, fleece, or fur fiber attached thereto, either in its raw or processed state.
- "Faux Fur" shall mean artificially manufactured fur which is made to resemble real fur but which is not derived from animals. If there is any ambiguity on whether Faux Fur should be included in the fiber content, please reach out to Kohl's PI team for guidance. Faux Fur should be called out immediately in Materials or Fabric stage of testing, as well as Finished Product/Garment testing reports.

Faux fur labeling set up example:

Faux Fur Trim: 100% Acrylic

^{**}For intimates/foundations, please refer to section VIII.B.

H. Real Leather and Non-Leather with Coating Application

Below are the guidelines for fiber content labeling for real leather and non-leather with coating application. Option 1:

No fiber content disclosure of the Coating $-\underline{If}$ the coating is used for aesthetic purpose only, i.e. sheen or shiny appearance AND weight of coating is less than 35% of the weight of the base fabric. HOWEVER, the fiber content of the base fabric must be disclosed on the fiber content label.

Example:

Shell: 100% Polyester Lining: 100% Acetate

Option 2:

Fiber content disclosure of the coating is <u>required</u> – <u>If</u> the coating looks like leather, the verbiage used to disclose the content of the coating is "Imitation Leather". Both coating and base fabric must be disclosed on the fiber content label.

Example:

Shell - Fabric: 100% Polyester Coating: Imitation Leather Lining: 100% Acetate

NOTE: Cold Weather Accessories, such as gloves, mittens or hats with a faux suede/faux leather patch does NOT need to be disclosed on the fiber content label. Proceed with "Exclusive of Decoration."

Faux suede may be made of such as polyester or else which is a textile material fall in FTC so many need to follow the condition of issuing EOD such as less than 15% surface area, if over 15% SA may need:

- -Faux leather generally may be made of coated fabric which is not textile material and not fall into the scope, using EOD is still fine on labeling
- -There for suggest to add at least the condition to use EOD need to fulfill "less than 15% by surface area" otherwise may need to label sectionally depending on material

Per 16 CFR 24, for Imitation Leather: If a material is made to look like leather, for example, Polyurethane-coated fabric, the fiber or material content must specifically declare "Imitation Leather" and describe the materials accurately.

I.) Fiber Content Labeling (Fiber Content Labeling (i.e. Recycled Cotton, Recycled Polyester, Organic Cotton, Tencel™ Lyocell, Rayon made from Bamboo, other Speciality Fibers, etc)

If submitting a product for testing that contains sustainable or trademarked content (i.e. Recycled cotton, polyester, organic, Tencel™ Lyocell, etc.), the vendor must provide the proper certification, attached to the Test Request Form (TRF) at the time of sample submission for testing.

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

IV. Registered Identification Number

The name or RN# (registered identification number) of the manufacturer or importer of record is required on the label. Wool Products Labeling (WPL) numbers for wool products, although no longer issued may be used.

Example: RN # 73277 Example: WPL # 12345

Exceptions:

- A) Li & Fung Kohl's RN# (73277)
 B) Domestic Importer Vendor's RN#
- 2) Exclusive Brands Kohl's RN# (73277)

V. 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

VI. Care Instructions

Please refer to Kohl's Care Label Policy.

VII. Mechanics of Labeling

The following information must be adhered to when preparing a label:

- Label must be in **English**. All parts of the label must be **permanent**, **legible**, **in one consistent font style and size**. No abbreviations, asterisks, footnotes or "ditto" marks are to be used
- Country of Origin must always be on the **front side** of the label
- The Country of Origin label must be affixed to the inside center of the neck (or center back on bottoms) between shoulder seams. The Country of Origin must always appear on the front side of the label, with no other labels covering it.
- All information pertaining to fiber content and RN # may appear either at the front or back of the label. Fiber content and RN# may appear along with other information i.e. care instructions.
- Labels must be easily accessible at the point of purchase.

EXAMPLES

*The below is acceptable on a garment IF placement of label is in center back of neck or bottoms, NOT on the side seam of a garment

100% COTTON
EXCLUSIVE OF
DECORATION
SIZE 10

MADE IN HONG
KONG
RN # 12345

MACHINE WASH
WARM WITH LIKE
COLORS
ONLY NONCHLORINE BLEACH
WHEN NEEDED
TUMBLE DRY LOW
WARM IRON IF
NEEDED
DO NOTIRON
DECORATION

BODY: 100%
COTTON
SLEEVE: 100% SILK
LINING: 100%
POLYESTER
SIZE 10

MADE IN HONG
KONG
RN # 12345

MACHINE WASH
COLD
WITH LIKE COLORS
GENTLE CYCLE
ONLY NONCHLORINE BLEACH
WHEN NEEDED
LINE DRY
WASM IRON IF

VIII. Specialty Labeling

A. Belt Labeling

Belts must be labeled per the below requirements:

- o Fiber Content Only applicable if belt is washable, i.e. scarf belt
- o Belts that are man-made leather or real leather MUST indicate the content.

Ex: Belts made out of man-made leather should be labeled as any of the below: Not Leather Imitation Leather Simulated Leather

- o If the belt is composed of both real and/or man-made leather AND fabric, then the fiber content must be included on the label.
- o Care Instruction Only applicable if the belt is washable.
- o Country of Origin Required
- o Size Required
- o RN# Required





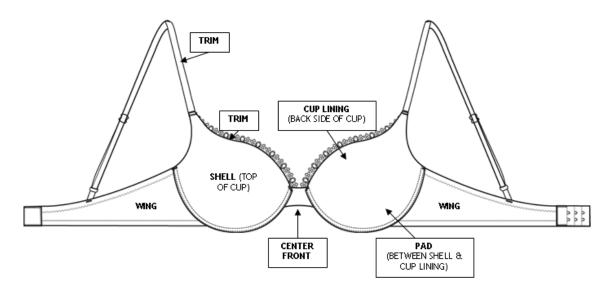




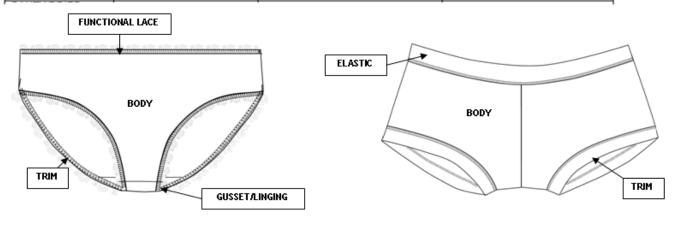


• Intimates Labeling

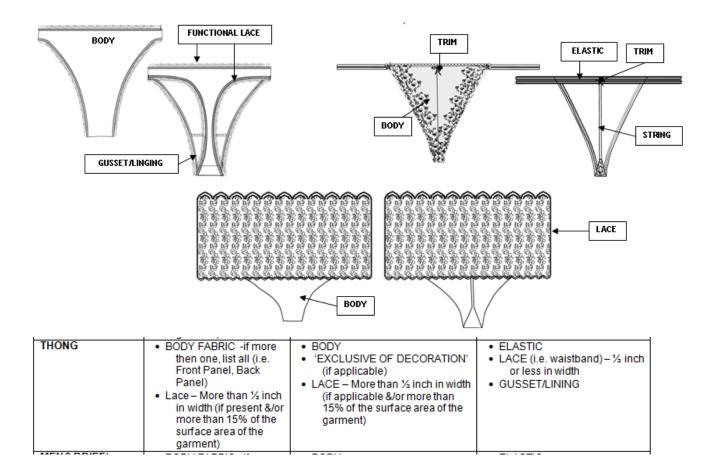
	es Labelling			
GARMENT TYPE	LAB INCLUDE IN FIBER ANALYSIS	LAB RECOMMEND FOR LABEL	DO NOT RECOMMEND FOR LABEL	
BRA	SHELL WING (if different than shell) CENTER FRONT/GORE	 SHELL WING CENTER FRONT 'EXCLUSIVE OF DECORATION' (if applicable) 	 CUP LINING PAD CONTENT TRIM (i.e. Lace, Picot Trim, etc.) Elastic band (sports bra) 	
PANTY/BRIEF	BODY FABRIC -if more than one, list all (i.e. Front Panel, Back Panel) Lace – More than ½ inch in width (if present &/or more than 15% of surface area of garment)	 BODY 'EXCLUSIVE OF DECORATION' (if applicable) LACE – More than ½ inch in width &/or more than 15% of the surface area of the garment 	 ELASTIC LACE (i.e. waistband, leg opening) – ½ inch or less in width TRIM (i.e. Lace, Picot Trim, etc.) GUSSET/LINING 	
THONG	BODY FABRIC -if more than one, list all (i.e. Front Panel, Back Panel) Lace – More than ½ inch in width (if present &/or more than 15% of the surface area of the garment)	BODY 'EXCLUSIVE OF DECORATION' (if applicable) LACE – More than ½ inch in width (if applicable &/or more than 15% of the surface area of the garment)	 ELASTIC LACE (i.e. waistband) – ½ inch or less in width GUSSET/LINING 	
MENS BRIEF/ BOXER BRIEF	BODY FABRIC -if more than one, list all (i.e. Front Panel, Back Panel)	 BODY 'EXCLUSIVE OF DECORATION' (if applicable) 	ELASTIC TRIM (i.e. Binding)	
CHILDREN'S UNDERGARMENT S	BODY FABRIC -if more than one, list all (i.e. Front Panel, Back Panel) WING (if different than shell)	 BODY 'EXCLUSIVE OF DECORATION' (if applicable) WING (if different than shell) 	ELASTIC TRIM (i.e. Lace, Picot Trim, Binding, etc.)	
BABYDOLLS	 SHELL WING(if different than shell) CENTER FRONT BODY – if more than one, list all (i.e. front panel, back panel) 	 SHELL WING(if different than shell) CENTER FRONT BODY – if more than one, list all (i.e. front panel, back panel) EXCLUSIVE OF DECORATION (if applicable) 	LINING PAD CONTENT TRIM (Lace, Picot, Trim, etc.)	



GARMENT TYPE	LAB INCLUDE IN FIBER ANALYSIS	LAB RECOMMEND FOR LABEL	DO NOT RECOMMEND FOR LABEL
BRA	SHELL WING (if differentthan shell) CENTER FRONT/GORE	SHELL WING CENTER FRONT 'EXCLUSIVE OF DECORATION' (if applicable)	CUP LINING PAD CONTENT TRIM (i.e. Lace, Picot Trim, etc.) Elastic band (sports bra)



PANTY/BRIEF	 BODY FABRIC -if more 	BODY	ELASTIC
	then one, list all (i.e. Front Panel, Back	 'EXCLUSIVE OF DECORATION' (if applicable) 	 LACE (i.e. waistband, leg opening) – ½ inch or less in
	Panel)	 LACE – More than ½ inch in width 	width
	 Lace – More than ½ inch in width (if present &/or more than 15% of surface area of garment) 	&/or more than 15% of the surface area of the garment	TRIM (i.e. Lace, Picot Trim, etc.) GUSSET/LINING
TUONO			



C. Crib booties/Soft Sole Baby Shoes Labeling







The following information must be provided in a newborn & infant crib bootie/soft sole shoe label.

Label Verification: mark whether present or absent in report data

- 1. Country of Origin
- 2. Gender and Size
- 3. Material Content
- 4. Tracking Label
- 5. RN

For more labeling information, please see Kohl's Footwear Commercial Label Requirements.

D. UV/UPF Labeling

What is UPF?

Ultraviolet Protection Factor (UPF) is a rating system used for apparel. It indicates how effectively fabrics shield skin from ultraviolet (UV) rays. The higher the UPF number, the greater the degree of UV Protection a garment offers.

UPF is similar to SPF (Sun Protection Factor), the rating system used for sunscreen products.

A label shall contain the following elements (See 401 Performance Claims Protocol for reference):

- 1. A UPF value
- 2. A classification category, Good UV Protection, Very Good UV Protection, or Excellent UV Protection.
- 3. A statement that the UV Protection textile product has been labeled according to the ASTM standard guide.

The same font and type size shall be used for protection category, UPF Value and label percent blocked values

The actual size and graphic layout of the labeling information is the responsibility of the final product manufacturer or
marketer.

Example:

UPF 50+ Excellent UV Protection Meets ASTM D6603 standards



A label may contain but is not limited to:

- 1. A percent UV-B and a UV-A blocked value or a percent UV-Block value
- 2. A statement that the UV Protection value indicates the lowest amount of protection that can be expected during the life of the product.
- 3. A statement that the product reduces exposure to harmful UV-A and UV-B rays

E. Down/Feather Labeling

The Federal Trade Commission (FTC) "Textile Fiber Products Identification Act" 16 C.F.R. Section 303.2 governing textiles, fiber and wool products state that all products containing filling materials, except those exempt or excluded under the Act, shall be labeled in conformity with the act.

Down clothing does not require the complex law tag label needed for bedding products. However, they must be labeled using the new USA-2000 down and feather standards.

Apparel products must declare the actual down content, but do not need the additional label information. Labels for apparel are in size, but they must have a label accessible to the consumer. This label should contain the general product category and the detailed sub-labeling percentage information, such as DOWN (Minimum 80% Down).

A jacket labeled DOWN must have a minimum of 75% down. This minimum down % should be listed. An example of the correct sewn-in label is:

WHITE GOOSE DOWN

(Minimum 75% Down)

A down/feather jacket with tested content of 65% down should be labeled:

DOWN & FEATHERS

65% Down 35% Waterfowl Feathers

	Minimum	Maximum	Max		Maximum	Maximum
GENERAL LABEL	Required	Landfowl	Damaged	Maximum	Down	Feather
(REQUIRED SUB-LABEL)	Down Cluster	Feathers *	Feathers*	Residue *	Fiber *	Fiber *
DOWN						
(MINIMUM 95% DOWN)	95 %	2.0 %	2.0 %	2 %	5 %	5 %
(MINIMUM 90% DOWN)	90	2.0	2.0	2	10	10
(MINIMUM 85% DOWN)	85	2.0	2.0	2	10	10
(MINIMUM 80% DOWN)	80	2.0	2.0	2	10	10
(MINIMUM 75% DOWN)	75	2.0	2.0	2	10	10
DOWN & WATERFOWL FEATHERS						
(DOWN 70%, FEATHERS 30%)	70	2.0	2.1	2	10	10
(DOWN 65%, FEATHERS 35%)	65	2.0	2.5	2	10	10
(DOWN 60%, FEATHERS 40%)	60	2.1	2.8	2	10	10
(DOWN 55%, FEATHERS 45%)	55	2.3	3.2	2	10	10
(DOWN 50%, FEATHERS 50%)	50	2.5	3.5	2	10	10
WATERFOWL FEATHERS & DOWN						
(FEATHERS 55%, DOWN 45%)	45	2.7	3.8	2	10	10
(FEATHERS 60%, DOWN 40%)	40	3.0	4.2	2	10	10
(FEATHERS 65%, DOWN 35%)	35	3.2	4.5	2	10	10
(FEATHERS 70%, DOWN 30%)	30	3.5	4.9	2	10	10
(FEATHERS 75%, DOWN 25%)	25	3.7	5.2	2	10	10
(FEATHERS 80%, DOWN 20%)	20	4.0	5.6	2	10	10
(FEATHERS 85%, DOWN 15%)	15	4.2	5.9	2	10	10
(FEATHERS 90%, DOWN 10%)	10	4.5	6.3	2	10	10
(FEATHERS 95%, DOWN 5%)	5	4.8	6.7	2	10	10
WATERFOWL FEATHERS		5.0	7.0	2	10	10

^{*} If Components exceed listed Maximum, such component percentages must be clearly labeled on the law tag label.

For this information and more examples please refer to www.iabflo.info/

F. Reversible Garment Labeling

When a garment is reversible, either a tear away/non-permanent or pocket label is acceptable. Note: This is applicable to Care Instructions, Country of Origin, Fiber Content and the RN Number.

G. Adaptive Apparel: Labeling Requirements

When an adaptive garment has magnets present, ALL Magnet Warning Label(s) MUST be permanently attached. This includes sewn in labels and heat seals. Tear away labels are NOT permitted. Reference protocol 502 for more information, and reach out to Kohl's PI/QA with any questions.

IX: Tracking Labels:

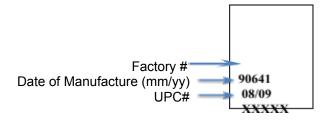
A. Adult Tracking Label:

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 tag:

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

If space limitations exist, contact Kohl's Quality Assurance & Product Integrity teams to discuss minimum required information (MR.QA.PI@kohls.com).

EXAMPLE (for quality tracking purposes):



B. Children's Tracking Label:

Kohl's will require all Kohl's private and licensed brand **children's products (sizes 0- 20)** to contain a label that includes "Kohl's", the product style number or name, 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:

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

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

^{*}Tear away labels are allowed on all other types of labels (eg care label, fiber content, etc).

Kohl's-assigned Factory Number, requests for confirmation of Factory Numbers can be directed to Kohl's Corporate Governance/Factory Compliance team – Attention: Socialcompliance@kohls.com.

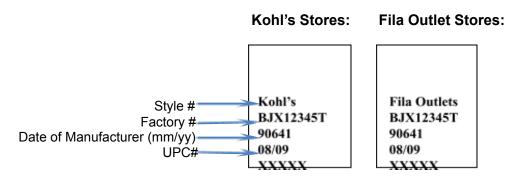
Kohl's generally expects this tracking label information to be included either as part of the existing sewn-in paper label that contains the product's UPC number or on a separate, new sewn-in label. It is expected that this label will most often be attached beneath a care/content label. For those products without a care/content label, the tracking label will most likely be attached to a side seam.

If a vendor's product includes one or more parts (for example, but not limited to, sheet sets, etc.), it is the vendor's responsibility to ensure all components are properly labeled or otherwise comply with the CPSIA's tracking label requirements.

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.

Please be advised that this summary of the CPSIA requirements is provided for informational purposes and should not be construed as legal advice on any specific requirement. As stated at the beginning of this summary, and as set forth in Kohl's Merchandise Purchase Order Terms and Conditions, Kohl's vendors must comply with any changes in existing laws or regulations, including – but not limited to – the legal requirements set forth in the CPSIA.

EXAMPLE



X. Disclaimers and Tags

Please see our Disclaimer Tag document, available on K-Link.

Appendix

For more details per refer to following list on federal and state regulations:

- The Care Labeling Rule, 16 CFR Part 423
- The Textile Fiber Products Identification Act, 16 CFR Part 303
- The Wool Products Labeling Act, 16 CFR Part 300
- The Federal Fur Products Labeling Act, 15 U.S.C. 69
- The Fur Products Identification Act, 16 CFR 301
- Customs Duties Country of Origin Marking, 19 CFR Part 134
- Children's Sleepwear, 16 CFR Part 1615 & 1616
- Leather Guide, 16 CFR 24
- Plumage Regulations, State of California Title 4 BHFTI Rules & Regulations, Article 5 & USA 2000 Labeling Standards & Feather Down & Feather Products
- Labeling of Filling Materials, State Requirements
- Product Size Specifications
- Voluntary Guide for Regulations on Small Parts, 16 CFR 1500 1501, ASTM F 963-17
- Threading Your Way Through the Labeling Requirements Under the Textile and Wool Acts
- The Consumer Product Safety Improvement Act of 2008 (CPSIA)

Revisions

6/23/20 – Updated email address for adult tracking label requirements.

7/27/2020 – Added Rayon from Bamboo & other specialty fibers to the fiber content labeling section

1/18/2023- Added updates to COO requirements for label placement

2/13/2023 - Updated Real Leather and Non-Leather with Coating Application option 2 section

4/12/2023- Added section "G" to Specialty Labeling section, to provide more clarity on adaptive labeling requirements, and magnet warnings needing to be permanent and not a tear away.