

Undue Influence Statement of Policy

STATEMENT OF POLICY

Our company has various responsibilities under the Consumer Product Safety Improvement Act (CPSIA) for ensuring children's products meet the requirements of the CPSIA.

Testing and certification of children's products are important parts of the process of compliance. By law, we must not apply undue influence on what the law calls "third party conformity assessment bodies" which are the testing laboratories we use to conduct the testing of those children's products, to produce favorable testing results for us.

The law does not provide a definition of "undue influence." It is our company's policy that any action or statement that undermines the credibility and validity of the testing process used for the certification of children's products is undue influence. If you have any doubt, report it.

All reported incidents of possible undue influence will be promptly and fully investigated.

TRAINING

It is our company's policy that we will train all employees who interact with testing laboratories to make certain no one engages in actions or makes statements that will be considered undue influence. If we change our undue influence policy, we are committed to retraining all employees regarding those changes.

In accordance with the requirements imposed upon us by the Consumer Product Safety Commission (CPSC), all employees who are trained will be required to sign a statement attesting to their training attendance.

PROCEDURE

If you witness or are aware of what you believe is an incident of undue influence, it is your responsibility to report it.

Every effort will be made to keep a report confidential, but remember, all of us have the responsibility to report undue influence, even though it may be difficult or uncomfortable to do so. Further, be assured, we will not tolerate any retaliation against you for reporting any incident or participating or cooperating with any investigation of an undue influence report.

You should report it to your immediate supervisor. If you are uncomfortable with reporting it to your supervisor for whatever reason (for example, that supervisor is involved in the incident of possible undue influence), (name, title, contact info) is the designated individual in our company for investigating any undue influence. You may also report an incident to any officer of the company if you feel that is the best course of action.

You may also report incidents of undue influence confidentially directly to the CPSC.
Phone: (301) 504-7923 or (800) 638-2772. The website is www.cpsc.gov

U.S. Consumer Product Safety Commission
4330 East West Highway
Bethesda, MD 20814

Supervisors and managers should immediately inform (name, title, contact info), the designated individual for investigating any undue influence, who will conduct the investigation, or inform any officer of the company. Supervisors and managers should not conduct their own investigation.

WHEN UNDUE INFLUENCE HAS BEEN FOUND TO HAVE OCCURRED

If necessary, employees who have been determined to have engaged in undue influence will be disciplined in accordance with our policies for employee disciplinary actions. As appropriate under the circumstances, the discipline may range from a written or verbal warning up to and including termination of employment.

We will take all appropriate actions to correct the situation including retesting of the products and retraining of employees.

We will promptly report all undue influence incidents to the Consumer Product Safety Commission.