



HPG Product Safety Policy Statement

HPG is committed to providing safe and compliant products to our customers. To ensure all products comply with all applicable federal, state regulations and industry standards, we developed the new state-of-the-art Safety Protocol.

The Safety Protocol for materials testing is established in association with the law firm of Brann & Isaacson (<http://www.brannlaw.com>). Brann & Isaacson's lawyers represent the Data & Marketing Association and over 100 online and multi-channel companies across the country, including over a dozen top internet retailers. Their areas of representation include regulatory matters, compliance with Proposition 65 and the Consumer Product Safety Act, among others.

The Safety Protocol requires that all products demonstrate - via testing by a world-recognized independent analytical laboratory - compliance with the California Proposition 65 exposure limits, the federal Consumer Product Safety Commission's toughest chemical content requirement as well as all other relevant mandatory and voluntary standards and regulations. Through our vigorous enforcement of Safety Protocol, HPG pledges to ensure compliance with California's Proposition 65 as well as all other relevant regulations and safety standards to protect our customers.

Product Safety Sheets and supporting documentation are readily available for all products upon request. As part of our rigorous quality program, we keep and maintain detailed quality records throughout our entire supply chain. At least on a bi-annual basis, HPG team from the United States conduct on site audit of our supplier factory to ensure and maintain the highest level of quality and safety for our product. Please contact compliance@hpgbrands.com for any safety and compliance related questions.

Thank you
Chris Anderson
CEO

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Product Risk Assessment

Risk assessment is conducted on new or modified products and products moved the new manufacturer to determine if it has a defect or hazard due to its design, materials or construction. Hazardous products are modified to eliminate the hazard and include appropriate warnings and safe use instructions.

Testing Methodology

All active products are tested to applicable US and Canada standards and regulations in addition to testing on lead and phthalates. Additional chemicals such as cadmium, BPA and other chemicals are tested as needed.

Lead and phthalates need to be tested according to the following methodology:

- CPSC-CH-E1001-08.3 Standard Operating Procedure for Determining Total Lead (Pb) in Children's Metal Products (Including Children's Metal Jewelry)
CPSC-CH-E1002-08.3 Standard Operating Procedure for Determining Total Lead (Pb) in Nonmetal Children's Products
- CPSC-CH-E1003-09 Standard Operating Procedure for Determining Lead (Pb) in Paint and Other Similar Surface Coatings
- CPSC-CH-C1001-09.4 Standard Operating Procedure for Determination of Phthalates

Testing Frequency

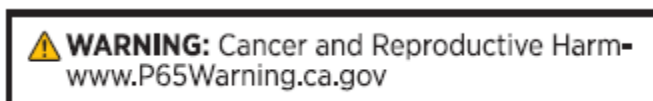
- All new products must be tested by an independent accredited analytical laboratory prior to being released for mass production and sale.
- When an existing product is moved to a new manufacturer or modified, the product will be tested by an independent accredited analytical laboratory before released for mass production and sale.
- Existing active product will be re-tested every 16-24 months based on risk level.
- All imprint inks and other decorating materials are tested each year.
- Child products must be re-tested annually or per purchase order. A child product is a product that is designed or intended primarily for use by children 12 and under. A toy is a child product that is designed or intended primarily for use by children 12 and under during play.
- Product will also be selected randomly and tested a certified US laboratory for verification.

California Proposition 65

The Safe Drinking Water and Toxic Enforcement Act of 1986, also known as California Proposition 65 intended to warn consumers of potential exposures to chemicals that are recognized by the State of California as carcinogens and reproductive toxins. If a product contains a chemical in excess of the Prop 65 limit, the product can still be sold in California provided a Prop 65 warning is attached to the product when it enters California.

HPG's goal is not to offer products that require Prop 65 warning label. We test all product to Prop 65 limits and reformulate if product fails the test. In cases where re-formulation is not possible and when Prop 65 warning label is necessary, the product will be shipped with the Prop 65 warning label regardless of its ship to destination and catalog and website will be updated with the warning.

- Prop 65 Product Label Warning (*Font size 6 or above*)



Recall Protocol

HPG's product recall procedure is chartered by Product Safety and Compliance Group. We continuously monitor www.saferproducts.gov, CPSC and Health Canada recalls, news media, and social media to learn about consumer products that have been or could be recalled. We will notify regulatory authorities and customers immediately in case of the recall.

Approved Accredited Laboratories

HPG's preferred labs are listed below. We also accept testing at CPSC -accepted testing laboratories that can be found at <https://www.cpsc.gov/cgi-bin/labsearch/>

- **Bureau Veritas**
<http://www.bureauveritas.com>
 CPSC Lab ID: 1018
 Certificate Number: L1307



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- **TTL Laboratories**

<http://TTL-labs.com>

CPSC Lab ID: 1097

Certificate Number: 2815.01 & 2815.02



- **Consumer Testing Laboratories, Inc**

<https://www.consumertesting.com/>

CPSC Lab ID: 1072

Certificate Number: 2731.01



- **Intertek**

<https://www.intertek.com/>

CPSC Lab ID: 1028

Certificate Number: L0139 & 2710



- **TUV SUD**

<https://www.tuv-sud-america.com>

CPSC Lab ID: 1491

Certificate Number: L7038



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