



## **FAQ**

1. When procuring products, how does your company begin the sourcing process?
  - We work to place business with existing, approved factories first and then search a larger group of factories.
2. Are you always aware of what country the product was manufactured in and know the manufacturer?
  - Yes, most of our products are manufactured in China, but there are also goods from suppliers elsewhere in Asia, Africa and the USA.
3. How do you determine when a product was manufactured?
  - Products are marked with our PO# which tells us date of manufacture.
4. How many sources might manufacture an item for PCNA?
  - It is item specific. Sometimes many, sometimes one.
5. What are some of the reasons that a product should be tested?
  - There are a number of reasons that cause a product to be tested. Quality control, regulatory requirements, food / drink contact, painted surfaces, attractiveness to children ....
6. What are the relevant regulations for the products that you import?
  - PCNA products are designed to meet Federal regulations. Applicable agencies with regulations could include Customs & Border Protection, Consumer Product Safety Commission, Food & Drug Administration, Federal Communications Commission, Environmental Protection Agency, US Dept of Agriculture, US Fish & Wildlife Service....
7. What industry standards apply to the products you sell?
  - The promotional products industry has no industry wide standards aside from the need to abide by applicable government regulations. Quality Certification Alliance (<http://www.qcalliance.org/>) is an independent accreditation organization recognizing companies that take the leadership role in improving industry standards. (<http://www.qcalliance.org/accredited-companies/>)
8. Describe the process by which you ensure that the products you sell conform to these regulatory and industry standards.
  - PCNA has a process that stretches from pre-launch and throughout a products lifecycle and includes a review for safety and compliance with applicable regulatory standards, the inspection and testing of finished goods, to verify that compliance is maintained.



9. How have you made your vendors aware of the CPSIA and other regulatory compliance laws?
  - Communications have been issued to Vendors, and specifications updated as appropriate.
10. How do you assure the quality of products?
  - Our QA program inspects goods prior to export to the US, and additional inspections take place in on arrival in the US.
11. What process do you conduct to know what products need to be tested?
  - Any product can be subject to testing.
12. Describe the procedure when one of the products you submit for testing, does not pass some or all of the tests.
  - Should an item fail testing, we have processes in place that will place goods from the same PO on Hold so that they cannot be sold. We would then start testing other PO's and evaluate like items to discover the extent of the problem. If necessary a procedure exists to issue a recall of applicable goods that had been sold.
13. How do you verify the substrate / material of the products you source?
  - Testing by 3<sup>rd</sup> party labs, supplemented by XRF scans by our staff in Asia.
14. Can you remove the "China" marking from items that we ordered?
  - Federal regulations under 19 U.S.C. 1304 prohibit the removal of these markings.
15. Can you provide NAFTA Certificate of Origin documents?
  - The majority of our products are manufactured in Asia and do not qualify for the NAFTA COO form. We can provide this form for those few items that do originate in North America.
16. Can you provide other Certificate of Origin documents when a distributor or end-user later shipping items abroad?
  - No. Certificate of Origin documents must be completed by the party actually exporting the goods. There are only a handful of countries that require COO documents. There are generic COO docs available to be filled out. Typically, they must also be notarized by an authorized Chamber of Commerce. PCNA products are marked with Origins and those origins would be noted on the COO.
17. Do PCNA products meet standards in effect in other countries?
  - PCNA products are designed to meet applicable national standards for the markets that we serve, the US and Canada.



18. Do you use a Restricted Substance List?
  - Yes, we employ an RSL and require our vendors to acknowledge that they will follow it.
19. What third party laboratory do you currently use to evaluate products against regulatory requirements?
  - PCNA uses globally recognized laboratories including AI, SGS, UL, Bureau Veritas and Intertek, to name a few.
20. How do you determine what products require third party testing?
  - Any product is subject to 3<sup>rd</sup> party testing, but emphasis is placed on “safety sensitive” items, which would include items that come in contact with food or drink, or might be attractive to children or contain lithium-ion batteries.
21. Describe the quality standards that are used by the manufacturing facilities of which you source products.
  - Factories are required to produce goods that meet our specifications, which include compliance with applicable standards.
22. How often do you audit the manufacturing factories you source from and what standards do you audit against?
  - Polyconcept personnel visit factories periodically throughout the year. We employ an in-house factory audit team that focuses on those factories that receive 80% of our spend for products. All finished goods go thru a QA inspection prior to export to the US. Some factories undergo 3<sup>rd</sup> party audits as well.
23. When conducting factory audits, do you also audit for child safety labor laws?
  - Yes, this is a key component in the Code of Conduct that our factories must abide by.
24. When you do not conduct factory audits, how are you assured that the factory you purchase from, are aware of US regulation and ensure their products meet all of those standards?
  - Factories sign a manufacturing agreement with PCNA, which includes their agreement to our Code of Conduct, and that products sold to us meet our specifications and are manufactured in a responsible manner.
25. How do you assure the traceability of the products you sell and their components?
  - Goods are marked with info that indicates code numbers that identify factory and PO number.
26. How can you assure the compliance to CPSIA of products manufactured for you?
  - a. Children’s products are tested to CPSIA requirements thorough the products lifetime.
27. Where can I find Children Product Certificates (CPC) or Certificates of Conformity (GCC) for your products?
  - When applicable, these are available on our website on the web page describing an item under “Tools & Compliance”.