



July 10, 2015

Compliance with Consumer Product Safety Laws Licensed Brands

Licensed Brands (Dockers, Chaps, and Keuka) and its vendors must comply with applicable federal, state, and local laws. Vendors shall ensure that products supplied to Licensed Brands comply with applicable laws before shipment.

The Consumer Product Safety Commission (“CPSC”) is the federal agency that enforces the Consumer Product Safety Act (“CPSA”) as amended by the Consumer Product Safety Improvement Act of 2008. The CPSA requires manufacturers and importers of record to provide certifications of compliance with rules, bans, and mandatory safety standards, including but not limited to the Flammable Fabrics Act, the Consumer Product Safety Act, and the Federal Hazardous Substances Act.¹

All Genesco vendors are required to fully comply with applicable federal, state, and local laws and to provide documents demonstrating compliance upon request.² Vendors must ensure that items comply with applicable requirements prior to shipment to Genesco.

For any products where Genesco is the importer of record, vendors must provide to Genesco — prior to shipment — completed copies of the Certificate of Conformity Information Form (attached here as Exhibit A). Genesco will not accept and will not certify products that lack the required certificate of conformity information form and testing documentation.

When Genesco is not the importer of record, Genesco requires that products be tested to applicable standards and certified by the domestic manufacturer or importer of record. For those products certified by the domestic manufacturer or importer of record, copies of the testing records and certificates must be provided to Genesco upon request.

¹ This document does not contemplate the supplying of children’s products to Licensed Brands. Additional testing requirements apply to children’s products.

² Other potentially applicable state regulations include, but are not limited to, California’s Proposition 65.

The following is not legal advice, and vendors should consult legal counsel if they have questions regarding their legal obligations. Listed below are some of the CPSC requirements that are especially pertinent to the types of products supplied to Licensed Brands.

I. General Certifications of Conformity (“GCC”)

A GCC is required for all items of adult wearing apparel. Examples of wearing apparel include, but are not limited to, jackets, shirts, sweaters, pants and belts. Footwear is not considered “wearing apparel.” When a Genesco company is the importer of record, Genesco will prepare the GCC based on the Vendor Cover Page for Shipment Approval and test results supplied to it by the vendor. When a Genesco company is not the importer of record, the vendor must prepare the GCC. The GCC must be immediately available if requested, but does not need to be provided to Genesco unless requested.

Compliance and certification for a GCC for adult wearing apparel must be based on a reasonable testing program. Items must be tested for compliance with all applicable CPSC-enforced standards at least once yearly or whenever there is a material change to the item, its source, or the manufacturing process.

A GCC must include:

1. All information in English
2. Name, full mailing address, and telephone number of the importer of record.
3. A product description sufficient to match the GCC to each product it covers and no others. For example, a GCC must identify the SKU, or item number(s).
4. The identification of each applicable standard, rule, ban or regulation.
5. Date (month, day, and year) of production start and end and place of manufacture.
6. Date of any test(s), and identity, address and telephone number of the lab that conducted the test(s), if applicable.
7. Name and full contact details of the individual responsible for maintaining test results.

II. Wearing Apparel – Required Testing and Exempt Fabric

Unless made entirely of exempt fabric, all items of wearing apparel must be tested for compliance with applicable regulations promulgated under the Flammable Fabrics Act at 16 C.F.R. 1602 *et seq.*

Exempt fabrics are those comprised entirely of:

- (1) Plain surface fabrics, regardless of fiber content, weighing 2.6 ounces per square yard or more; and
- (2) All fabrics, both plain surface and raised-fiber surface, regardless of weight, made entirely from any of the following fibers or entirely from a combination of the following fibers: acrylic, modacrylic, nylon, olefin, polyester, and wool.

(16 C.F.R. 1610.1(d)).

If an item of wearing apparel is comprised entirely of exempt fabric, it must still be certified as compliant, but the GCC shall indicate that it is exempt from testing under 16 C.F.R. 1610.1(d).

For additional information about these regulations, go to: <http://www.cpsc.gov/about/cpsia/cpsia.html>

Genesco may request tests in order to support the product exemption reasoning

Exhibit A

Certificate of Conformity Information Form	
Product Name	_____
Style #/ Vendor Style #	_____
PO# (Order #)	_____
PO Quantity broken out by style	_____
Manufacturer name	_____
Manufacturer address Manufacturer, city, state or providence, country and zip	_____ _____ _____
Manufacturer contact name	_____
Manufacturer phone	_____
Manufacturer email	_____
Production Quantity	_____
Production Start Date	_____
Production Finish Date	_____
In addition, please provide the following:	
Test report (Attach separately, if applicable)	_____
Photo of Product	_____
Photo of country of origin label	_____
Photo of care label	_____
Photo of RN# on label	_____
Material content label	_____
<small>* For additional information about these regulations, go to: http://www.cpsc.gov/about/cpsia/cpsia.html</small>	
<small>* E-mail reports and completed form to vendorcompliance@Genesco.com</small>	

TEST REPORTS MUST BE ATTACHED

Instructions for Completing Vendor Cover Page for Shipment Approval

1. Form is used only when a Genesco is the importer of record.
2. The completed form, and any test reports, should be e-mailed to vendorcompliance@genesco.com as early as possible in the process and is required for approval of shipment.
3. As the vendor, you must determine whether the fabric is exempt from testing. If the product is exempt please inform this to vendorcompliance@genesco.com and provide the test reports to support the reasoning of the product being exempt.

A copy of the [Certificate of Conformity Information Form](#) is located within the forms section.