Whispering Pines Sportswear, Inc.

Jonathan Corey | Willow Pointe | InnerHarbor | ProLine Sportswear | 24/7 Lifestyle | ADAMS

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January 3, 2018

Alphabroder,

We have contacted the factories that manufacture private label programs for us, regarding compliance with the necessary documentation for the Consumer Safety Commission and Improvement Act of 2008. As the Importer of Record for all of our headwear, it is our understanding that all production manufactured after November 12, 2008 will be in full compliance. We will complete the necessary product testing by an independent laboratory. As required, we will have a CPSIA General Conformity Certificate on file for each purchase order.

When necessary, we will have on file certificate of third-party testing by an accredited laboratory. They will be furnished to customers upon request.

The certificate of compliance will include as required:

1. Identification of the product covered by the certificate.
2. Citation to each CPSC product safety regulation to which this product is being certified.
3. Identification of the U.S. Importer of Record certifying compliance of the product.
4. Contact information for the individual maintains records of test results.
5. Date and location when the product was manufactured (city and country).
6. Date and place where this product was tested for compliance with the regulations.
7. Identification of any third-party laboratory on who's testing the certificate depends.

The law is now limited to importers of record. This eliminates the previous requirement of multiple participants within the supply chain. It has also been confirmed that certificates can be electronic and still meet the rules regarding accompanying the shipment and furnishing the documentation to distributors and retailers.

Headwear:

Adult

We have concluded that adult headwear is exempt from the CPSCIA law and that no Certificates of Conformity are needed. However, to avoid confusion, for caps and garment that do not require testing or a GCC, we have elected to utilize a certificate of compliance which

states "Pursuant to the Consumer Product Safety Act of 2008, this certificate assures that the subject product as described conforms to the safety standards to which the said product is applicable". In addition, we will include a notice of general test waiver for exempt products, since the fabric used to manufacture the styles on the PO identified were produced from fabric weighting more than 2.6 oz/yd.

Kids (under 12)

This product category falls under the new law. Our factory has confirmed they will include a General Certificate of Conformity with every shipment and that all production passes the standards. The required tests under the law are:

Lead content – Lead HR4040 (CPSIA 2008)

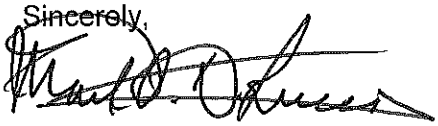
Cadmium content – (DIN EN 1122:2001)

Phthalates content – (DIN EN ISO 18856)

Federal Flammability Standard (16 CFR part 1610)

We have a similar standard operating procedure to confirm that all garments meet the required regulations.

Sincerely,



Mark DeLucca

Executive Vice President