

Hoffmaster Group, Inc. Corporate Policy on Undue Influence of a Third Party Conformity Assessment Body

As required by the Consumer Product Safety Improvement Act's Testing and Certification Rules (16 CFR 1107.24), Hoffmaster Group, Inc. has a corporate policy of forbidding the exercise of any undue influence on a third party conformity assessment body ("laboratory") by any employee or supplier in regards to the testing of all products, including children's products, to all mandatory safety standards. The policy is outlined in the sections below.

What is "Undue Influence"?

Undue influence is any attempt to influence a third party conformity assessment body to issue favorable results or hide unfavorable results regarding testing of all products, including children's products, or any interference in the integrity of the testing process. This may be pressure from the manufacturer to issue passing test results for non-compliant product, or to not issue failing test results. It may be implied that future business depends on favorable results for products submitted for testing. There are many avenues of undue influence and it is critical to avoid any actions that may be construed as undue influence on the third party conformity assessment body.

These actions are expressly forbidden by the Testing and Certification rules enumerated at 16 CFR 1107.24 as the integrity of the safety testing process is paramount in assuring the on-going safety and quality of our product. Any employee or supplier who witnesses or feels pressured to be party to an attempt to hide or exert undue influence over test results from a third party conformity assessment body is required to report this to the Consumer Product Safety Commission ("CPSC"). The CPSC may be contacted anonymously if desired.

As a result, all personnel involved in the quality / product safety testing / regulatory compliance areas of product development, or any other employee or supplier with direct contact with a third party conformity assessment body is required to undergo the training as specified in this policy. This training will outline what undue influence is, including examples, what the employee's / supplier's duties and responsibilities are and how to avoid causing undue influence, and how to contact the CPSC in the event undue influence is suspected.

Note that this policy does not forbid questioning a third party conformity assessment body over a test result that is believed to be erroneous on the lab's part is not considered undue influence, but simply routine investigation of a test report that is believed to be inaccurate.

Mandatory Retraining:

Retraining is necessary and required for all applicable employees / suppliers in the case where there is a change in these CPSC rules regarding undue influence (16 CFR 1107.24). It is the responsibility of the Corporate Regulatory Compliance Manager to monitor CPSC rule changes and announcements and to inform employees / suppliers that a change has occurred and that retraining will be necessary for the applicable parties. In addition, company training materials shall be updated to reflect whatever changes occur in the regulations.

Reporting Undue Influence to the CPSC:

Employees / suppliers who have witnessed or suspect any undue influence of a third party conformity assessment body to hide or otherwise affect test results are required to immediately contact the CPSC and report these allegations. The CPSC may be contacted through their website at <http://www.cpsc.gov/cgibin/info.aspx> or by phone at (800) 638-2772. This reporting may be done confidentially without notifying company management if desired.