

GEMLINE UNDUE INFLUENCE POLICY

POLICY

Gemline is committed to complying with the Undue Influence requirements of the Consumer Product Safety Improvement Act and the Final Rule on Testing and Certification of Children's Products, issued by the Consumer Product Safety Commission.

The Undue Influence requirements prohibit manufacturers from exercising undue influence on a third party conformity assessment body (i.e., a CPSC-accredited, third party testing laboratory).

Gemline will not tolerate any efforts to unduly influence third party conformity assessment bodies.

PROCEDURE

Undue Influence Defined

Undue influence is any action taken by Gemline personnel that could undermine the integrity of laboratory test data used in the certification of children's products.

Training

All employees that interact with testing labs will be trained to safeguard against exercising undue influence on testing labs. If Gemline makes any substantive changes to this policy, all employees that interact with testing labs will be retrained regarding those changes. All employees must sign a statement attesting to their attendance at the training.

Reporting

It is the responsibility of each employee to promptly report any incident of undue influence to the Compliance Manager at compliance@thegemgroup.com, who is responsible for investigating undue influence reports.

An employee is not required to report incidents of undue influence to the Compliance Manager if that person is the individual who is exercising undue influence, or if the employee would feel more comfortable reporting the incident(s) to his or her immediate supervisor or any other member of management.

An employee may also confidentially report incidents of undue influence directly to the Consumer Product Safety Commission. The Consumer Product Safety Commission can be contacted at (800) 638-2772 or through <https://www.cpsc.gov>

Supervisors or managers who receive reports of, or otherwise observe, incidents of undue influence should immediately inform the Compliance Manager or another appropriate Gemline Manager, so that an investigation may be initiated.

Investigation

Every reported incident of undue influence will be investigated thoroughly, promptly, and to the extent possible, in a confidential manner.

Gemline will not tolerate retaliation against any employee for reporting an incident or cooperating in an investigation of reported undue influence.



On Trend | On Time | On Budget™

Corrective Action and Discipline

If undue influence is established, Gemline will take corrective action. Gemline will immediately report such findings to the Consumer Product Safety Commission. Corrective action may also include, for example, retesting of the product implicated, training, and/or disciplinary action ranging from verbal or written warnings up to and including termination of employment, depending upon the circumstances.

If you have questions about this policy or Gemline's Compliance Program, please contact your Gemline representative or the Gemline Compliance Team at compliance@thegemgroup.com