



Worzalla Publishing Company (WPC) Consumer Product Safety Improvement Act – Policy and Procedures

WPC's Commitment: Worzalla will use book components (adhesives/glues, ink, paper, board & surface coatings) to manufacture printed and bound materials that are not only safe, but also comply with all relevant laws and regulations.

Implementation Date: February 9, 2009

Documentation: All Certificates of Compliance (CoC) shall be maintained by the VP-Administration and the Environmental Health & Safety (EHS) Coordinator. All General Conformity Certifications (GCC) shall be maintained by the Information Services Department.

General Conformity Certifications: WPC will issue a GCC for each book or printed product that is designed primarily for children 12 or younger that is subject to the CPSIA. The form that WPC will be using has been approved by the Book Manufacturers' Institute (BMI) and will be used by all printers to provide continuity throughout the implementation process. WPC will not customize or accept any changes to this standardized, industry-specific form.

Procedure: WPC will begin issuing GCC's effective February 9, 2009, for all U.S. distributed and printed children's products manufactured by Worzalla Publishing Company. The GCC will be issued the day that the finished product is complete and ready for shipment to the customer. The GCC will be sent as an e-mail to one main contact person for the corresponding customer. The Bill of Lading will identify your customer service representative contact for additional GCC information and/or copies.

Customers will be required to identify any product that is primarily intended for a child of 12 years and under and/or whether the product has inherent play value (i.e., stickers, toys attached to the books, etc.) at the time of the issuance of a purchase order to a Worzalla customer service representative (CSR).

Vendors and suppliers to Worzalla will be required to furnish the WPC VP-Administration with annual Certificates of Compliance (CoC) which state that the supplied paper or components contain less than 100 ppm of lead and that this certification is based on a reasonable testing program. Customers that want third party testing of a given title or printed product will be charged the direct costs of any such tests conducted. Such tests are and will be separate from the GCC process and may affect the customer ship date.

Companies providing outside services to Worzalla will be required to provide WPC with an annual CoC for products and components that are completed and returned to WPC to enter into the manufacturing process.

WPC appreciates your time and patience in adjusting to these new requirements, the implementation process and a new set of standards. WPC will keep you informed of any major changes that may occur with the CPSIA requirements. If you have any questions and/or concerns, please feel free to contact your customer service representative or contact either of the individuals who manage this program for Worzalla:

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