



CPSIA Compliance Material Change Policy

After the initial certification of a children's product, The Image Group recognizes that *material changes* may occur. A material change is one that could affect the product's ability to comply with applicable rules, standards, or regulations as established by the Consumer Product Safety Commission.

The Image Group recognizes three major categories of material change, as defined by the Consumer Product Safety Commission:

- Product design, which includes all component parts, their composition, and their interaction and functionality when assembled.
- Manufacturing process, which includes changes in how the children's product is made that could affect the finished products' ability to comply with the applicable safety rules.
- Sourcing of component parts, which include changes that result from the replacement of one component part of a product with another component part that could affect compliance. This includes, but is not limited to, changes in composition, part supplier, or the use of a different component part from the same supplier who provided the initial component part.

Material changes are not defined to mean color changes on press.

When material changes occur, The Image Group will ensure compliance with applicable safety standards through compliance testing at an independent CPSC accredited laboratory. Component part testing may be used where permissible.

For products that have undergone a material change, new Children's Product Certificate will not be issued until new test data has been received. Changes that cause a children's product safety rule to no longer apply to a children's product are not considered material changes. The extent of testing needed depends on the extent of the material change.