



## COMPLIANCE PROTOCOL

### Corporate Social Responsibility

Sweda Company, LLC is committed to conduct its business activities in a socially responsible, ethical and sustainable manner consistent with all applicable national and local legal requirements, customs, and published industry standards pertaining to employment and manufacturing.

Our policies and practices ensure Sweda maintains fair and decent working conditions throughout our business operations. We require our supplier partners to do so as well.

#### Labor Standards:

- a. **Forced Labor** – Sweda does not use, promote and enhance any type of forced labor, whether in the form of prison labor, indentured labor, bonded labor, or otherwise.
- b. **Child Labor** – Sweda does not employ people under the age of 15, or the minimum age for the completion of compulsory education, or the minimum age of employment required by law in the country of manufacture, whichever is higher.
- c. **Harassment** – At Sweda, every employee is treated with dignity and respect. No employee shall be subject to any physical, sexual, psychological, or verbal harassment or abuse.
- d. **Health and Safety** – All employees shall be provided with a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring during work or as a result of the operation of Sweda facilities.
- e. **Wages and Benefits** – Sweda recognizes that wages are essential to meeting employees' basic needs. Sweda pays all employees at least minimum wage as required by all applicable local laws and provides all legally mandated benefits.
- f. **Working Hours** – Sweda's work week is scheduled Monday through Friday and shall not exceed 48 hours on a regular basis. Except for in extraordinary business circumstances Sweda employees do not work more than either (a) the limits on regular and overtime hours allowed by local law or (b) a maximum 60 hours a week inclusive of overtime. All overtime is consensual and shall be paid at a premium rate. Employees are entitled to one day off in every seven-day period.
- g. **Overtime Compensation** – In addition for compensation for regular hours of work, Sweda employees are compensated for overtime hours at such premium rate as is legally required by law.
- h. **Non-Discrimination** – Sweda will not tolerate discrimination in its employment practices based on race, color, religion, sex, age, physical disability, origin or any other basis prohibited by law.

### Compliance

- a. Sweda's production facility successfully passed a social compliance audit in the past 24 months.
- b. Sweda is a signatory to the *PPAI Code of Conduct for social compliance*.
- c. Sweda employs a full-time compliance specific and trained Supervisor.

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- d. All products are fully compliant with all Federal, State and Local laws and regulations throughout the USA.
- e. Sweda require our manufacturing factories and vendors to follow and implement compliance protocols and independent third-party testing.

***Testing protocols are monitored by Sweda Compliance Team in USA and China.***



### **Product Development, Risk Assessment, Compliance Assessment**

- a. Sweda maintains a "Bill of Materials" for each of the products documenting its raw materials.
- b. A "risk assessment" process is standard operating practice for evaluating new products.
- c. Sweda's team regularly visits, evaluates and audits the factories for potential business.
- d. Sweda commissions third-party lab tests for most new products before adding them into product line.

### **Ink Testing**

- a. Sweda follows all testing protocol set forth by ink suppliers for ink testing.
- b. Sweda maintains CPSIA and CA Prop65 test reports for all our inks.

### **Third Party Laboratory Testing**

- a. Sweda maintains current third-party lab test reports for all products.
- b. Sweda tests all products for CPSIA Lead-in-Substrate at third party labs.
- c. Sweda tests all products for CPSIA Lead-in-Surface Coating at third party labs.
- d. Sweda tests all phthalate containing products for 10P-current 2020 CPSIA and CA Prop65 standards.

### **Overseas Quality Management**

- a. Sweda maintains an overseas office with full time employees in Ningbo, China performing sourcing and QC inspections.
- b. Sweda maintains all current Audit Reports and subsequent CAPA( Corrective and Preventative Action) Plan for all factories.
- c. Sweda maintains a documented process for all operations including but not limited to raw material, in-production and finished products.
- d. Sweda compiles a historical record of QC inspections to evaluate production, quality and compliance issues.

### **Restricted Substances - Lithium-ion Powered and Electronic Products**

- a. Sweda's tech factories send products to our third-party testing facilities for all compliance testing.
- b. Sweda offers UN 38.3, UL 2056, IEC-62133, UL-2054 certified products.
- c. Sweda maintains test reports for the lithium-ion used in the batteries.
- d. Sweda complies with UPS, FedEx and IATA packing requirements for all electronic products.
- e. Sweda has a recall readiness program in place.



### California Proposition 65

Any Compliant products do not require CA Prop65 Warning labels for items shipping into the State of California. Any other state does not require a CA Prop65 Warning label.

For a CA Prop65 Non-Compliant product, a CA Prop65 Warning label is required only for shipments into the State of California. Any other state does not require a CA Prop65 Warning Label.