



September 24, 2019

Memo: 2019 Heavy Metals & Cadmium Requirements

Dear Supplier,

In our ongoing efforts to meet Industry Standards or Regulatory Guidelines, we constantly review and make updates when required to the list of Spector & Co.'s Restricted Substance List. With the changes taking place with Prop 65 enforcement and Canadian Requirements we need to update our policy to reflect the new requirements as laid out in Annex 1 attached ***Effective Immediately.***

We are experiencing increased pressure from the market and our mutual customers to ensure that we supply compliant product. Therefore, we ask that you continue to support us in our ongoing business by continuing to ensure compliance to Lead, Mercury, Nickel, Phthalates & Cadmium limits set out in Annex 1.

It is extremely important that you continue to inform your factories and material suppliers of these Product Compliance requirements.

Suppliers are held responsible for ensuring compliance at all times. This means, that suppliers through their own sourcing & testing protocols ensure product materials & components comply at every stage of production. When Spector & Co requires a 3rd party Lab test report to show conformity, suppliers will be contacted to provide certification. We conduct testing on all incoming shipments to verify conformity. One of methods is XRF testing.

Refer to Annex 1 attached for the compliance limits. Please note that these requirements relate to all components of the item for both surface coatings and substrates (material, metal components, lining, coating, edge painting, cables, pen refill tip, inks etc.). An accessible component is a component that could be touched by a person during normal and reasonable foreseeable use.

We look forward to a successful outcome and count on your support to ensure that all our products comply with these standards.

**Failure to comply may result in penalties imposed to suppliers.**

Should you have any questions please do not hesitate to contact me at [chrisp@spectorandco.com](mailto:chrisp@spectorandco.com)

Thank you for your cooperation.

Chris Pearson  
Director of Compliance

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**Annex 1\***

<b>Accessible Component</b>	<b>Maximum Lead Level (ppm)</b>
Total Lead Content in Paint or other surface coatings	90
Polyvinyl Chloride (PVC) and other soft plastic	100
Total lead in Metal, plastic and other components	100
<b>Phthalates</b>	<b>Maximum Level (ppm)</b>
<ul style="list-style-type: none"> <li>• Diisononyl phthalate (DINP)</li> <li>• Diisobutyl phthalate (DIBP)</li> <li>• Di-n-pentyl phthalate (DPENP or DnPP)</li> <li>• Di-n-hexyl phthalate (DHEXP or DnHP)</li> <li>• Dicyclohexyl phthalate (DCHP)</li> <li>• Di-(2-ethylhexyl) phthalate (DEHP)</li> <li>• Dibutyl phthalate (DBP)</li> <li>• Benzyl butyl phthalate (BBP)</li> <li>• Di-n-octyl phthalate (DNOP)</li> <li>• Diisodecyl phthalate (DiDP)</li> <li>• Diethyl phthalate (DEP)</li> </ul>	1000
<b>Cadmium</b>	<b>Maximum Level (ppm)</b>
Cadmium	75
<b>Mercury</b>	<b>Maximum Level (ppm)</b>
Mercury	75
<b>Soluble Nickel</b>	<b>Maximum Level (ppm)</b>
Soluble Nickel	75

\*Please note these limits and requirements can change with 120 days written notice.