


## Hub Product Safety Statement

California Proposition 65 (Prop 65) is the Safe Drinking Water and Toxic Enforcement Act of 1986 published as Section 25249.7 of California's Health and Safety Code. Proposition 65 is intended to warn consumers of potential exposures to chemicals that are recognized by the State of California as carcinogens and reproductive toxins. Prop 65 applies to all consumer goods sold within the state and impacts all importers, domestic manufacturers, and retailers of these items

Hub Pen Company maintains its own Hub Safety Protocol™ program to inspect and thoroughly test all products to make sure they comply with California's Proposition 65 and all other national safety standards. To ensure compliance with the Hub Safety Protocol™, Hub Pen Company requires that its products demonstrate - via testing by an independent accredited analytical laboratory - that they comply with both the California Proposition 65 exposure standard as well as the Federal Consumer Product Safety Commission's toughest requirements. Through our vigorous enforcement of the Hub Safety Protocol™, Hub Pen Company pledges to ensure compliance with California's Proposition 65 as well as all relevant national safety standards to protect our customers.

Safety sheets and supporting documentations are readily available for all products upon request. As part of our rigorous quality program, we keep and maintain detailed quality records throughout our entire supply chain. This starts with inspections at our oversea factory by qualified audit team in China. We also set up third-party factory audits for both social and quality compliance on a regular basis. At least on a bi-annual basis, Hub Pen team from the United States conduct on site audit of our supplier factory to ensure and maintain the highest level of quality and safety for our product.

Thank you



Joseph Fleming  
President

## Testing Methodology

Based on risk assessment of our product and market, an independent accredited analytical laboratory will perform compliance testing on Lead and Phthalates on all active products. Additional chemical such as Cadmium, BPA and other chemicals will be tested as needed.

- CPSC-CH-E1001-08.3 Standard Operating Procedure for Determining Total Lead (Pb) in Children's Metal Products (Including Children's Metal Jewelry)  
[https://www.cpsc.gov/s3fs-public/pdfs/blk\\_pdf\\_CPSC-CH-E1001-08\\_3.pdf](https://www.cpsc.gov/s3fs-public/pdfs/blk_pdf_CPSC-CH-E1001-08_3.pdf)
- CPSC-CH-E1002-08.3 Standard Operating Procedure for Determining Total Lead (Pb) in Nonmetal Children's Products  
[https://www.cpsc.gov/s3fs-public/pdfs/blk\\_pdf\\_CPSC-CH-E1002-08\\_3.pdf](https://www.cpsc.gov/s3fs-public/pdfs/blk_pdf_CPSC-CH-E1002-08_3.pdf)
- CPSC-CH-E1003-09 Standard Operating Procedure for Determining Lead (Pb) in Paint and Other Similar Surface Coatings  
<https://www.cpsc.gov/s3fs-public/CPSC-CH-E1003-09.pdf>
- CPSC-CH-C1001-09.4 Standard Operating Procedure for Determination of Phthalates  
[https://www.cpsc.gov/s3fs-public/CPSC-CH-C1001-09.4\\_Standard\\_Operating\\_Procedure\\_for\\_Determination\\_of\\_phthalates.pdf?Uaxl4lIPOM6FkTpgas9fFKWLRsOCue0t](https://www.cpsc.gov/s3fs-public/CPSC-CH-C1001-09.4_Standard_Operating_Procedure_for_Determination_of_phthalates.pdf?Uaxl4lIPOM6FkTpgas9fFKWLRsOCue0t)

## Testing Frequency

- All New Products must pass testing by an independent accredited analytical laboratory prior to being released for mass production and sale.
- When an existing product is moved to a new manufacturer, the product will be tested by an independent accredited analytical laboratory before released for mass production and sale.
- All imprint inks and other decorating materials are tested each year.
- Re-Testing Frequency. The frequency of retesting is established based upon the potential risks associated with the product and the sales volume of the product.

We test all colors of all components of all products to all standards that apply.  
Formal Test Reports can be requested thru your sales rep.

## Approved Accredited Laboratories

- **Bureau Veritas**  
<http://www.bureauveritas.com>

CPSC Lab ID: 1018  
Certificate Number: L1307



- **TTL Laboratories**  
<http://TTL-labs.com>

CPSC Lab ID: 1097  
Certificate Number: 2815.01 & 2815.02



- **Consumer Testing Laboratories, Inc**  
<https://www.consumertesting.com/>

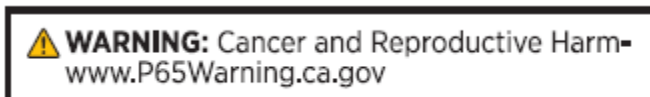
CPSC Lab ID: 1072  
Certificate Number: 2731.01



## Prop 65 Label

To comply with the new Prop 65 warning regulation effective August 30, 2018. All products manufactured after Aug 15, 2018 that has a Prop 65 listed chemical above exposure limits, will be shipped with the new warning label regardless of its ship to destination.

- Product Label Warning (*Font size 6 or above*)



- Catalog/Website Warnings

Catalog will update with applicable warning for non-compliant products.

# Example of Third Party Lab Report



HUB PEN COMPANY  
Technical Report: (6618)079-0577  
APR 26, 2018  
Page 2 of 8

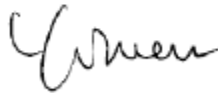
## REMARK:

1. The client specified the test method and requirement.
2. As per client's request, only Total lead in substrate for the ball pen except the tip of the refill, Phthalates content for the rubber grip were conducted in this report.

## BVCPS (SHANGHAI) GENERAL CONTACT INFORMATION FOR THIS REPORT

TELEPHONE NO 86-21-24166888  
E-MAIL: [bvcpshtoy.sh@cn.bureauveritas.com](mailto:bvcpshtoy.sh@cn.bureauveritas.com)

**BUREAU VERITAS**  
**CONSUMER PRODUCTS SERVICE DIVISION (SHANGHAI)**  
Laboratory Test location:  
**No. 368, Guangzhong Road, Zhuanqiao Town, Minhang, Shanghai.**  
**No. 168, Guanghua Road, Zhuanqiao Town, Minhang, Shanghai.**



YIWEN YAO  
PROJECT MANAGER-HARDLINE DIVISION



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VERITAS

Test requested by client:

Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating
AR	Consumer Product Safety Improvement Act of 2008 / CPSC-CH-E1001-08.3/CPSC-CH-E1002-08.3 / CPSD-AN-00185-MTHD/CPSD-AN-00196-MTHD	All accessible substrates, before and after use and abuse testing, on items intended for children ages 12 and under shall not contain lead in excess of 0.01% (100ppm) of the weight of the total content. In case of insufficient material for testing found on number of samples specified in the protocol, vendor needs to provide components/parts for testing. Report actual results or include data table within report. Issue a third party test report. Component testing is allowed. Compositing up to 3 like materials is allowed except metal.	X	X	X	<p>M</p> <p>Black soft plastic(penholder)(678): &lt;10ppm</p> <p>Light grey plastic without electroplating(pen point/pen tailed)(678)+white plastic(inside penholder)(678)+black plastic(pen parts)(678): 14.7ppm</p> <p>Black soft plastic(penholder)(658): &lt;10ppm</p> <p>Black plastic(penholder)(658)+grey plastic without electroplating(pen point/pen tailed)(658)+black plastic(pen parts)(658): 10.8ppm</p> <p>Black soft plastic(penholder)(648): &lt;10ppm</p> <p>white plastic(pen parts)(648)+Light grey plastic without electroplating(pen point/pen tailed)(648): &lt;10ppm</p> <p>Black soft plastic(penholder)(636)+Black soft plastic(pen point)(636): &lt;10ppm</p> <p>Black plastic(inside pen)(636)+black plastic(pen parts)(636)+Light grey plastic without electroplating(pen point/pen tailed)(636): 15.2ppm</p> <p>Black plastic(pen tailed)(635)+grey plastic(inside pen)(635)+Light grey plastic without electroplating(pen point/pen tailed)(635):</p>	PASS



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Evaluation	Citation / Method	Criteria	1 Star	2 Star	3 Star	Result	Rating
						<p>&lt;10ppm</p> <p>Black soft plastic(penholder)(632): &lt;10ppm</p> <p>Black plastic(pen tailed)(632)+black plastic(inside pen)(632)+Light grey plastic without electroplating(pen point/pen tailed)(632): 18.6ppm</p> <p>Black soft plastic(penholder)(630): &lt;10ppm</p> <p>Black soft plastic(penholder)(629): &lt;10ppm</p> <p>Black soft plastic(penholder)(628): &lt;10ppm</p> <p>Black ink(628): &lt;10ppm</p> <p>Silver metal(pen clip)(678): &lt;10ppm</p> <p>Black metal(barrel)(678): &lt;10ppm</p> <p>Light blue metal(barrel)(678): &lt;10ppm</p> <p>Champagne gold metal(barrel)(678): 31.5ppm</p> <p>Silver metal(pen clip)(658): 14.9ppm</p> <p>Black metal(barrel)(658): 15.0ppm</p> <p>Light blue metal(barrel)(658): 11.6ppm</p> <p>Champagne gold metal(barrel)(658): 12.7ppm</p> <p>red metal(barrel)(658): 16.9ppm</p> <p>Silver metal(pen clip)(648): 24.8ppm</p> <p>Black metal(barrel)(648): 10.6ppm</p> <p>Light blue metal(barrel)(648): &lt;10ppm</p> <p>Champagne gold metal(barrel)(648): 10.1ppm</p> <p>red metal(barrel)(648): 44.0ppm</p> <p>Silver metal(pen clip)(636): 26.2ppm</p> <p>Black metal(barrel)(636): 18.3ppm</p> <p>blue metal(barrel)(636): &lt;10ppm</p> <p>Light blue metal(barrel)(636): &lt;10ppm</p> <p>Champagne gold metal(barrel)(636): 12.9ppm</p> <p>red metal(barrel)(636): &lt;10ppm</p> <p>Silver metal(pen clip)(635): 26.5ppm</p>	



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VERITAS

Evaluation	Citation / Method	Criteria	1	2	3	Result	Rating
			Star	Star	Star		
						Blue/silver metal(pen holder)(635):<10ppm Black/silver metal(pen holder)(635):11.3ppm Light blue/silver metal(pen holder)(635):<10ppm Grey/silver metal(pen holder)(635):11.8ppm Red/silver metal(pen holder)(635):<10ppm Silver metal(pen clip)(632):27.4ppm Blue/silver metal(barrel)(632):<10ppm Grey/silver metal(barrel)(632):11.2ppm Green/silver metal(barrel)(632):<10ppm Red/silver metal(barrel)(632):<10ppm Blue/silver metal(barrel)(630):<10ppm Green/silver metal(barrel)(630):<10ppm Orange/silver metal(barrel)(630):<10ppm Purple/silver metal(barrel)(630):<10ppm Blue/silver metal(barrel)(629):<10ppm Green/silver metal(barrel)(629):27.8ppm Grey/silver metal(barrel)(629):38.9ppm Purple/silver metal(barrel)(629):<10ppm Gold/silver metal(barrel)(629):<10ppm Silver metal(electric plating)(628):35.2ppm	



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VERITAS

Evaluation	Citation / Method	Criteria	Result	Rating
A R Phthalates content	16 CFR 1307 / CPSC-CH-C1001- 09.3 (Mod) / CPSC-CH-C1001- 09.4 (Mod) / CPSC-AN-00143- MTHD	<p>Children's toys and childcare articles, before and after use and abuse testing, shall not contain concentrations of more than 0.1% BBP, DBP, DEHP, DINP, DIBP, DnPP, DNOP, DIDP, DHP or DCHP individually.</p> <p>Actual testing would be conducted on all accessible plastics materials (including natural and synthetic rubber) (excluding materials listed below), plasticizer print, scrapable surface coatings, decals, polymeric coated materials (unscrapable), adhesives and sealants (exclude adhesive for stickers), toy nail polish, reusable packaging, electrical plug and cables.</p> <p>Polypropylene (PP), polyethylene (PE), acrylonitrile butadiene styrene (ABS), general purpose polystyrene (GPPS), medium-impact polystyrene (MIPS), high-impact polystyrene (HIPS), and super high-impact polystyrene (SHIPS), and their additives as listed in 16 CFR 1308 are exempt from testing, however, they are not exempt from compliance or certification.</p> <p>If material identification is not provided, phthalate testing will be conducted on all plastic materials.</p> <p>Vendor shall be responsible for the compliance of all other accessible materials, including additives in the exempt plastic materials.</p> <p>In case of insufficient material for testing found on number of samples specified in the protocol, vendor needs to provide components/parts for testing.</p> <p>Report actual results or include data table within report.</p> <p>Component testing is allowed.</p> <p>Compositing up to 3 like materials is allowed.</p> <p>Product manufactured and imported as of April 25, 2018 must comply.</p>	M Black soft plastic(pen holder)(678): Not detected Black soft plastic(pen holder)(658): Not detected Black soft plastic(pen holder)(648): Not detected Black soft plastic(pen holder)(636): Not detected Black soft plastic(pen holder)(632): Not detected Black soft plastic(pen holder)(630): Not detected Black soft plastic(pen holder)(629): Not detected Black soft plastic(pen holder)(628): Not detected	PASS

## **Products that requires Prop 65 labeling**

*None of current products will require Prop 65 labeling*