Protecting Human Health + the Ecosystem

MADE SAFE® CERTIFICATION STANDARD

MADE WITH SAFE INGREDIENTS

MADE SAFE Certification Standard V-1.3(2023)

MADE SAFE Certification

MADE SAFE's mission is to revolutionize how consumer products are made, thereby eliminating the use of harmful chemicals from the marketplace to ensure a safe and sustainable future for all.

MADE SAFE Certification is a rigorous, scientific, independent program that screens to verify that over 6,5000 banned or restricted substances are avoided or constrained. That is only the starting point. Substances then undergo additional screening in our Ecosystem Approach to determine if they're eligible for use in certified products.

The MADE SAFE approach is an elective process and requires transparency and disclosure beyond INCI labeling requirements. Companies must disclose known added substances in formulations undergoing screening for MADE SAFE review. This process is therefore conducted under NDA with companies undergoing screening and make even require third-party NDAs.

Companies must gather and submit extremely detailed ingredient information and specifications as part of the comprehensive screening process. This is an iterative process and will take weeks to months, depending on how thorough the information presented to the screening team is upon submission, the complexity of substances, and numerous other factors. This 360-degree evaluation of added ingredients and materials is what makes MADE SAFE Certification incredibly stringent; every substance reported to us by a company is considered in the context in which it will be used and must pass the screening process for the MADE SAFE seal to be granted for use on a given product.

Products that pass certification standards earn the MADE SAFE seal, signifying that the product is Made With Safe Ingredients™.

MADE SAFE Certification Scope

The following product categories are within the scope of MADE SAFE Certification under version 1.3:

1. Apparel
2. Baby & Child (Personal care, bedding, apparel, bottles, etc.)
3. Personal Care
4. Perfume
5. Cosmetics
6. Skin Care
7. Period & Feminine Care
8. Sexual Health Personal Care
9. Bedding (Mattresses, toppers, pillows, bedding, etc.)
10. Cleaning Products
11. Sunscreens (Non-aerosols)
12. Oral Care
13. Pest Control (Indoor/outdoor pest control products, insect repellent, etc.)

The following product categories are outside of the scope for MADE SAFE Certification:

1. Supplements and medications
2. Food
3. Cookware
4. Medical products (Exceptions: OTC acne care, sunscreen)
5. Building materials

Whether a product falls within a permitted product category and is within the scope for MADE SAFE Certification is at MADE SAFE's discretion.

Definitions of Terms

Added ingredient: Added ingredients are ingredients intentionally added to a formulation. Many of these ingredients are disclosed on the label, but not all are disclosed. This is because proprietary information (like fragrances and flavors) and ingredients at concentrations below INCI disclosure labeling requirements are not required to be included on labels. For this reason, MADE SAFE does not rely on INCI product labels for screening, but rather submitted reported ingredients from companies seeking certification and composition disclosures from ingredient suppliers and manufacturers.

Added material: Added materials are those that are the primary materials used to construct the product in question. They do not include processing aids. For example, in a mattress, added materials include the coils, support and comfort layers, top and bottom layers, flame retardants, waterproofing, etc. In a textile-based product like clothing or bedding, added materials include the primary material itself, threads, embroidery, prints, dyes, etc. MADE SAFE relies on submitted reported materials and substances from companies seeking certification and composition disclosure from suppliers and manufacturers to bolster accuracy.

Reported ingredients/materials/substances: Companies must submit all known ingredients, materials, and substances in each product undergoing certification to MADE SAFE for review. In addition to companies' submission forms containing self-reported substances, MADE SAFE also requires composition disclosures from ingredient/material manufacturers and suppliers to bolster the accuracy of companies' substance submissions to MADE SAFE. What is not reported, disclosed or found in the screening process cannot be screened.

MADE SAFE Certification Process Overview

The scientifically rigorous MADE SAFE Screening Process is an independent third-party review that determines if reported ingredients and materials in each product undergoing screening are made without known or suspected harmful substances.

MADE SAFE's goal is to verify that products that undergo the certification process do not contain reported ingredients or materials known or suspected to be harmful. MADE SAFE screens for known toxic substances in the following categories:

Behavioral Toxins	Toxic fire retardants	Reproductive Toxins
Carcinogens	Heavy Metals	Toxic solvents
Developmental Toxins	Neurotoxins	Harmful VOCs
Endocrine Disruptors	High-Risk Pesticides	

MADE SAFE Certification is considered a *paper screening*, which means that ingredients and materials undergoing screening are reported and submitted by companies. Compliance with substance-specific criteria is primarily completed through companies furnishing documentation that demonstrates adherence. In select situations, companies may be required to pursue lab testing to demonstrate compliance with certain criteria, but this is not required for all ingredients and screenings. Because MADE SAFE certification is primarily a paper screening, we rely on companies to accurately and completely disclose and report added ingredients and materials to MADE SAFE during the submission process. Additionally, MADE SAFE requires composition disclosures for submitted substances from ingredient/material manufacturers to increase substance disclosure accuracy.

MADE SAFE Certification Process + Standards

1. **Company Signs Agreement:** Company signs screening agreement and Non-Disclosure Agreement to begin work. This provides confidentiality during the screening process; MADE SAFE understands that the substance information submitted is sensitive, confidential, and sometimes proprietary in nature.
2. **Company Submits Ingredients/Materials:** To help establish product transparency, companies are responsible for submitting all known substances added to a product, including fragrances and flavors, for review.
3. **Banned & Restricted List Screening:** Reported substances are first screened against the MADE SAFE Banned & Restricted List. This list contains over 6,5000 toxic substances that have been compiled from authoritative lists from around the world. The Banned & Restricted List is five times the size of the European Union's list of restricted substances. It is also hundreds of times

larger than the list of substances restricted by the U.S. Food & Drug Administration and the Environmental Protection Agency combined.

The Banned & Restricted List contains known and probable harmful substances in numerous categories such as:

- Toxic antibacterials + antimicrobials
- Harmful artificial colors + dyes
- Bisphenols
- Carcinogens
- Chemicals of high concern
- Chemicals classified as persistent, bioaccumulative, or toxic to aquatic life or terrestrial life
- Coal tar ingredients
- Endocrine disruptors
- Behavioral toxins
- Developmental toxins
- Reproductive toxins
- Neurotoxins
- Teratogens
- Endangered species
- Ethanolamine ingredients
- Formaldehyde releasers
- Toxic flame retardants
- Fluorinated + PFAS compounds
- Toxic fragrance ingredients
- Genotoxins
- Heavy metals
- Isothiazolinone preservatives
- Isocyanates
- Nanomaterials
- Toxic solvents
- Persistent organic pollutants
- PCBs
- Polyethylene glycol compounds (PEGs)
- High-risk pesticides
- Polysorbates
- Retinol derivatives
- Siloxanes + silanes
- Ecotoxic surfactants
- Paraffin oil, paraffin wax, petrolatum + liquid paraffinum ingredients
- Parabens
- Phthalates
- Poisonous plants
- Silver compounds
- Synthetic musks
- Harmful UV blockers + filters
- Harmful VOCs

If a substance is not found on the Banned List, it progresses and undergoes additional screening in subsequent review steps (below). Restricted substances are held to applicable standards. Restrictions may include concentration limits, testing requirements, contamination specifications, etc. Some substances may have category specific allowances or technically unavoidable content, in which case either additional testing, threshold requirements, or other conditions may apply. In line with the hazard-based approach, MADE SAFE will select the most conservative requirement in place in the instance that authoritative bodies' recommendations conflict.

The Banned & Restricted List is not an exhaustive list of substances prohibited and restricted by MADE SAFE; it is only the first step in scientific review that must be cleared.

All reported added materials in textile-based products like clothing, bedding, and mattresses must meet Banned & Restricted List Criteria. The processing and manufacturing of textile-based products like clothing, bedding, and mattresses are exempt from the MADE SAFE Banned & Restricted List, as we defer to Global Organic Textile Standard (GOTS) and Global Organic Latex Standard (GOLS) requirements for the processing of applicable product materials in this category. Companies must demonstrate compliance with these certifications' criteria to obtain MADE SAFE approval on applicable materials.

4. **Database Screening:** The substance database warehouses information on thousands of unique substances and is the heart of the Ecosystem Approach screening data. The database is dynamic

and constantly evolving. Each time we screen an item, we add it to the database, making it smarter and faster with each review.

Reported substances are run through MADE SAFE's proprietary database to determine whether they have been previously reviewed. If a substance has been previously reviewed via the Ecosystem Screening Approach and a determination is available, that determination is provided to the company seeking screening.

If the substance has not been screened previously, it undergoes comprehensive ecosystem and human toxicity review under the MADE SAFE Ecosystem Approach screening. This review allows MADE SAFE to determine is the substance is eligible for use in certified products.

5. **MADE SAFE Ecosystem Approach Screening:** In the MADE SAFE Ecosystem Approach screening, substances are reviewed to determine whether they are known or likely to cause adverse effects in humans, the environment, aquatic life, or terrestrial life. The assessment is completed by answering four general questions:

    - Is the substance likely to bioaccumulate in humans or animals?
    - Is the substance likely to be persistent in soil, sediment, water, and/or air?
    - Is the substance likely to be toxic to aquatic life?
    - Is the substance likely to be toxic to terrestrial life?
    - Is the substance known or suspected to cause harm in humans?

    Answering these questions in done by evaluating each area of potential concern. Substances must meet applicable thresholds (some use case exceptions may apply) to qualify for MADE SAFE Certification.

    In order to review each substance for the toxicity concerns listed, MADE SAFE evaluates both modeled and measured data; measured data is given preference and supersedes modeled data. Measured data is primarily obtained from publicly available sources. Data may also be obtained from ingredient and material manufacturers if insufficient data is available publicly.

    EPI Suite™ and ECOSAR models are used to search for relevant properties of each substance if no measured data are available.

    Precautionary Principle & Hazard-Based Approach

    If no data or modeling is available or is not sufficient, MADE SAFE does not permit the substance until substantial data or modeling is available, deferring to the precautionary principle. The precautionary principle states that ingredients should be considered 'guilty until proven innocent', flipping the conventional approach to chemical safety in the U.S. that adheres to a traditional toxicological framework.

Additionally, MADE SAFE reviews chemicals through a hazard-based approach. The traditional risk-based approach asks, "how much of this substance can be used before it become toxic?" Whereas a hazard-based approach says, "if a substance is toxic, it should be avoided, regardless of the amount used."

MADE SAFE believes that substances should be demonstrated to be non-hazardous prior to use and that problematic chemicals should be avoided as much as possible, regardless of concentration. This approach also aims to avoid regrettable substitutions.

MADE SAFE Ecosystem Approach Criteria

a) Bioaccumulation: The bioaccumulation hazard trait is defined as the accumulation of a chemical in the tissue of organisms through any route, including respiration, ingestion, or dermal, including direct contact with contaminated water, sediment, and pore water in the sediment, or through transfer through the food chain.

Evidence for the bioaccumulation hazard trait includes, but is not limited to:

- log octanol-water partition coefficient (log Kow) ≥ 4
- log bioaccumulation factor (log BAF) or log bioconcentration factor (log BCF) ≥ 4
- trophic magnification factor (TMF) or biomagnification factor (BMF) > 1 in aquatic or terrestrial systems
- log organic carbon partition coefficient (log Koc) ≥ 3
- results from bioaccumulation models indicating potential for bioaccumulation
- structural similarity to other bioaccumulative chemicals

If a substance meets any of these criteria, its eligibility will be weighted heavily toward disqualification from use in MADE SAFE products.

The bioaccumulation definition and criteria are directly from the California Office of Environmental Health Hazard Assessment and has been somewhat simplified for use in MADE SAFE's Ecosystem Approach.

b) Environmental Persistence: The environmental persistence hazard trait is defined as the propensity for a chemical substance to remain in the environment for a long time subsequent to its release by resisting chemical and biological degradation.

Evidence for environmental persistence includes but is not limited to:

- half-life in marine, fresh or estuary water > 40 to 60 days
- half-life in sediment or soil > 2 months
- half-life in ambient air > 2 days (with some exceptions allowed)

- resistance to degradation in wastewater treatment processes
- structural similarity to other persistent chemicals

If a substance meets any of these criteria, its eligibility will be weighted heavily toward disqualification from use in MADE SAFE products.

The persistence definition and criteria are directly from the California Office of Environmental Health Hazard Assessment and has been somewhat simplified for use in MADE SAFE's Ecosystem Approach.

c) Aquatic Toxicity: The aquatic toxicity hazard trait is defined as a substance's ability to cause harmful effects to aquatic animals.

To evaluate acute aquatic toxicity, if acute measured data are available, United States Environmental Protection Agency Web-ICE (Interspecies Correlation Estimation) model is used. Web-ICE can be used to estimate toxicity to multiple species. A species sensitivity distribution (SSD) is calculated, which estimates the concentration (HC5) that is expected to be protective of 95% of the species in the SSD. Aquatic toxicity thresholds below will be used to evaluate the HC5.

To evaluate chronic aquatic toxicity, if chronic measured toxicity data are available, the lowest toxicity value (most protective species) among the data available will be used.

If acute and/or chronic toxicity data is not available, quantitative structure-activity relationship (QSAR) models (EPI Suite™, ECOSAR, etc.) are used to gather relevant information on each substance. The lowest toxicity value (most sensitive species) among the results given in QSAR models will be used.

Aquatic acute toxicity thresholds (EC50, LC50, etc.):

≤ 1,000 µg/L = Very toxic, Acute category 1

> 1,000 to ≤ 10,000 µg/L = Toxic, Acute category 2

> 10,000 to ≤ 100,000 µg/L = Harmful, Acute category 3

> 100,000 µg/L = Not classified, Acute category 4

Aquatic chronic toxicity thresholds (NOEC, etc.):

≤ 10 µg/L = Very toxic, Chronic category 1

> 10 to ≤1,000 µg/L = Toxic, Chronic category 2

>1,000 to ≤10,000 µg/L = Harmful, Chronic category 3

>10,000 µg/L = Not classified, Chronic category 4

Aquatic toxicity thresholds are based on OECD guidelines and the Minnesota Pollution Control Agency's methods for the derivation of aquatic life screening values.

If a substance's predicted or measured acute or chronic toxicity falls into category 1 or 2, its eligibility will be weighted heavily toward disqualification from use in MADE SAFE products.

d) Terrestrial Toxicity: The terrestrial toxicity hazard trait is defined as a substance's ability to cause harmful effects to land animals.

To evaluate acute terrestrial toxicity, if acute measured terrestrial toxicity data are available, United States Environmental Protection Agency Web-ICE (Interspecies Correlation Estimation) model is used. Web-ICE can be used to estimate toxicity to multiple species. A species sensitivity distribution (SSD) is calculated, which estimates the dose (HD5) that is expected to be protective of 95% of the species in the SSD. Terrestrial toxicity thresholds below will be used to evaluate the HD5.

To evaluate chronic terrestrial toxicity, if chronic measured toxicity data are available, the lowest toxicity value (most protective species) among the data available will be used.

If acute and/or chronic toxicity data is not available, quantitative structure-activity relationship (QSAR) models (EPI Suite™, ECOSAR, etc.) are used to gather relevant information on each substance. The lowest toxicity value (most sensitive species) among the results given in QSAR models will be used.

Terrestrial acute toxicity thresholds (LD50, etc.)

≤ 5 mg/kg-bw = Very highly toxic, Acute category 1

> 5 to ≤ 50 mg/kg-bw = Highly toxic, Acute category 2

> 50 to ≤ 300 mg/kg-bw = Moderately toxic, Acute category 3

> 300 to ≤ 2,000 mg/kg-bw = Slightly toxic, Acute category 4

> 2,000 mg/kg-bw = Practically nontoxic, Acute category 5

Terrestrial chronic toxicity thresholds (NOAEL, etc.):

≤ 0.05 mg/kg-bw = Very highly toxic, Chronic category 1

> 0.05 to ≤ 0.5 mg/kg-bw = Highly toxic, Chronic category 2

> 0.5 to ≤ 3 mg/kg-bw = Moderately toxic, Chronic category 3

> 3 to ≤ 20 mg/kg-bw = Slightly toxic, Chronic category 4

> 20 mg/kg-bw = Practically nontoxic, Chronic category 5

Terrestrial toxicity thresholds are based on OECD guidelines.

If a substance's predicted or measured acute or chronic toxicity falls into category 1 or 2, its eligibility will be weighted heavily toward disqualification from use in MADE SAFE products.

e) Human Health: MADE SAFE evaluates the human health hazard trait by reviewing whether a substance is known or suspected to cause harm in the following areas of concern:

- Behavioral toxicity
- Carcinogenicity
- Developmental toxicity
- Endocrine disruption
- Neurotoxicity
- Reproductive toxicity
- Mutagenicity

To identify if a substance is known or suspected to cause harm in these categories, MADE SAFE looks for the substance's appearance on the Banned & Restricted List, which contains authoritative red lists from around the world. If the substance appears on any of the authoritative lists consulted, it is generally ineligible for use.

MADE SAFE also considers available endocrine disruption modeling and assays. If the substance is associated with assay or modeling results that indicate endocrine disruption, the substance is generally disqualified for use.

Finally, MADE SAFE also considers mutagenicity assays. Positive results that indicate mutagenicity result in the substance's eligibility being weighted heavily toward disqualification from use in MADE SAFE products.

f) Contamination: To further push supply chain and manufacturing transparency, MADE SAFE considers problematic contamination risks that may originate in the manufacturing process or from the supply chain. Where known, MADE SAFE enforces applicable requirements to reduce or eliminate contamination, or offers suggestions for improvements.

In the case of textile-based products like clothing, bedding, and mattresses, MADE SAFE defers to GOTS and GOLS requirements for the processing of product materials in this category, including standards that may affect contaminants like by-products and residuals.

g) Presumed Safe Substances: Some substances are exempt from the MADE SAFE Ecosystem Approach via the Presumed Safe approval pathway. Ingredients that are Presumed Safe have generally withstood the test of time and have typically been used for hundreds or thousands of years without known harm. To qualify for the Presumed Safe designation, ingredients must meet a series of relevant challenges:

- Is the substance food-grade and/or considered edible? I.e., has the substance been consumed as a foodstuff for hundreds or thousands of years? (Note that not all food-grade substances are permitted.)

  OR

  Has the substance been used for similar purposes for hundreds of years without known cause for concern?

- Has the substance undergone processing? If so, details of processing must be provided and meet relevant MADE SAFE standards.
- Is the substance pure? If not, details of any sub-constituents must be provided and approved by MADE SAFE.
- Is the substance considered endangered? Endangered substances are not typically allowed for use in MADE SAFE certified products to uphold our promise to protect ecosystems, even though they may be considered safe for human use.
- Has the substance been heavily treated with any substance during growth or harvest? If so, details must be provided and approved by MADE SAFE.
- Do any other criteria, restrictions or requirements apply to the substance, according to MADE SAFE standards? If so, compliance must be demonstrated.

6. **Use Case Exceptions:** Some use case exceptions to the Ecosystem Approach screening are permitted in select instances. In some cases, substances are considered in the context in which they'll be used, and this context informs their usage permissions and requirements. Use case exceptions may include: materials that bolster longevity to decrease waste by increasing durability, best-in-class materials where industry innovation of ideal solutions does not yet exist, instances in which a governmental regulation requires the use of an imperfect material, etc. Most materials do not qualify for Use Case Exceptions. All applicable substances must meet Use Case Exception criteria as set forth by MADE SAFE during the screening process. Companies must demonstrate compliance with all Use Case Exception requirements.

   In instances of Use Case Exceptions, MADE SAFE provides suggestions for areas of improvement for companies to take back to their material/ingredient suppliers and manufacturers to spark innovation and progress. Additionally, when innovation becomes available to fill an identified area of improvement, we work with companies to transition to new best-in-class materials.

7. **Substance-Specific Requirements:** Reported ingredients must meet substance-specific requirements. Substance-specific requirements are determined based on the unique characteristics of a specific substance. For example, these characteristics may include: manufacturing processes, raw materials, contamination risks, and more.

Below, some of the documentation that may be required is listed. Not all items listed are required for every substance. MADE SAFE will provide a checklist for all required applicable documentation in Phase 1 of the MADE SAFE Certification process. Determining whether documentation or testing meets certification requirements is at the sole discretion of MADE SAFE.

Required for All Reported Ingredients and Materials:

- **Complete Composition Declaration:** Documentation that accounts for the entirety of a multi-substance ingredient/material or single-substance ingredient/material. This document should explicitly list each sub-substance, if applicable, or state that the substance is only one single substance. Acceptable documents may include MSDS, Certificates of Authenticity, or manufacturer statements. Because this documentation is not harmonized across material suppliers and manufacturers, compliant documentation may exist in many forms.

Required When Listed in Phase 1 of MADE SAFE Certification:

- **MSDS:** Material Safety Data Sheet
- **Manufacturing Process Flow Chart/Description:** This document provides a detailed description, chart or graphic of the process used to synthesize, produce, or manufacture a material or substance. This paperwork must include all chemical inputs and their identities, including CAS numbers.
- **Non-Synthetic Biology Documentation:** Paperwork to demonstrate that synthetic biology is not used in the process of making a substance. Acceptable non-synthetic biology documentation demonstrates that genetic engineering has not been used at any point in the manufacturing process, including raw materials, inputs, and processing aids. This includes microorganisms, enzymes, and fungi. MADE SAFE Synthetic Biology Declarations are also acceptable documentation for this requirement.
- **Non-GMO Documentation:** Documentation affirming that the substance is non-GMO. This includes all raw materials inputs and processing agents. Note that GMO-free documentation which attests to the absence of GMO material via testing is not typically acceptable. Organic certification documentation is accepted.
- **Sustainable Palm Documentation:** Certification demonstrating palm-derived ingredients are sourced sustainably. This typically comes in the form of Roundtable on Sustainable Palm Oil (RPSO) Supply Chain or Mass Balance certification, but other certifications may be accepted. (Note: typically, manufacturer self-declaration statements do not contain sufficient evidence demonstrating compliance.)
- **Non-Nanomaterial Documentation:** Documentation that demonstrates that the material in question is not a nanomaterial, as per MADE SAFE standards. Lab testing must

demonstrate that the material's primary particle size is larger than 100 nanometers. (Two lab testing methods and/or specific lab methods are required in some instances.)

- **Heavy Metals Panel:** Results from heavy metals lab testing. This may be included within a COA, MSDS, ingredient dossier or otherwise. Lab testing must include a metal-by-metal panel and must include antimony, arsenic, cadmium, lead, mercury, and nickel. Testing must be to MADE SAFE detection limit standards. Other metals may be required in some instances.
- **Plant-Sourcing Documentation:** Documentation demonstrating that the ingredient is not of synthetic origin.
- **Sustainable Sourcing Documentation:** Documentation that demonstrates that the ingredient has been sourced sustainably. This is most commonly requested for ingredients that may be endangered.
- **Organic Certification:** Documentation from a qualified organic certifying entity (USDA, Oregon Tilth, etc.). (Organic proof is only required in very specific cases.)
- **Specific Certification Documentation:** For some ingredients and materials, MADE SAFE may require documentation that demonstrates compliance with another certifying body's standards.
- **Additional testing:** At its sole discretion, MADE SAFE may require additional testing to demonstrate compliance with certification standards.

Note that this is not an exhaustive list. Other forms of documentation may be requested. In the case of required lab testing, MADE SAFE must approve the method and laboratory before testing.

8. **Final Report Issued:** MADE SAFE provides the company undergoing screening with a final report containing results. The company is guided through the results and subsequent product determinations.

   For products not eligible for MADE SAFE Certification, companies are provided with guidance for improvement. Companies can then reformulate and then re-submit for re-screening. Companies may reformulate on their own or may work with Nontoxic Certified's Transformation Partners Program for bespoke reformulation guidance and assistance. Companies may also be granted Provisional Use of the Seal contingent on Phase Outs or changes in ingredient suppliers (see below for more details).

   For products that pass all screenings, the MADE SAFE seal is awarded.

   At this point, Companies may work with the MADE SAFE team to announce certification.

Package Labelling Requirements + Use of the MADE SAFE Seal

Fragrance & Flavor Disclosure

"Fragrance", "Flavor", "Parfum" "eau de toilette", "natural flavor", "artificial flavor" and other similar terms on ingredient labels are umbrella terms for trade secret formulations that can contain many ingredients. Companies are legally allowed to withhold disclosure of these formulations because they are deemed trade secret by the U.S. Food and Drug Administration, which exempts them from listing on product packaging.

To bolster transparency and empower consumers to make the best possible decisions for themselves and their families, fragrance and flavor formulations within MADE SAFE Certified products must be disclosed. There are numerous options for disclosure to meet this requirement:

- **Disclosure on the product's packaging:** The entirety of the fragrance is disclosed on the packaging of the product in question. This option is preferred and recommended by MADE SAFE.
- **Disclosure on the product's webpage:** The entirety of the fragrance is disclosed on the designated webpage for the product in question. This option is not recommended but is considered acceptable by MADE SAFE.
- **Disclosure of all fragrance/flavor ingredients in a master list on the company's webpage**: All fragrance/flavor ingredients within MADE SAFE certified product(s) sold by the company are disclosed in a single, easily accessible master list on the company's webpage. The company does not need to denote which component is contained within each specific product. This option is not preferred or recommended by MADE SAFE.

Companies undergoing MADE SAFE certification of a product containing fragrance and/or flavor must demonstrate compliance with disclosure requirements to be granted use of the seal. Failure to comply with disclosure requirements results in MADE SAFE's refusal to grant certification. Any company with product(s) found to be out of compliance with this requirement must remedy the issue immediately; if action is not taken, MADE SAFE will begin the Decertification process (below).

Use of the MADE SAFE Seal & Packaging

Proper Seal Use: The MADE SAFE Certification seal must be used precisely as provided to a company who has achieved certification and strictly in accordance with any usage guidelines provided by MADE SAFE. The MADE SAFE seal may not be modified or edited, except for color selection for packaging and marketing. Only products that have earned MADE SAFE Certification or Provisional Use of the Seal may wear the MADE SAFE seal. Companies achieving MADE SAFE certification or Provisional Use of the Seal are solely responsible to ensure that product labeling, marketing, and advertising of certified products is truthful and not deceptive to consumers.

If a MADE SAFE certified product is no longer in compliance with certification standards, the product in question undergoes the process of Decertification. In these instances, the company must immediately cease all use of the MADE SAFE Certification seal, among other Decertification requirements.

Provisional Use of the Seal and Phase Outs: Provisional Use of the Seal may be granted to product(s) that have not yet met all certification requirements, contingent on bespoke criteria being met by a discrete deadline set forth by MADE SAFE. In instances of Provisional Use of the Seal, companies may use the seal on packaging and in advertising and may market the product as MADE SAFE Certified.

Granting Provisional Use of the Seal is up to MADE SAFE's discretion alone and may only be granted in certain instances. For example, Provisional Use of the Seal may be granted contingent upon an agreed upon Phase Out of an ineligible ingredient, change in ingredient sourcing, and/or completion of screening of specific substances. Phase Outs are instances in which a grace period is offered to a company in which a specific ingredient or material must be removed or swapped from the formula undergoing certification. During the Phase Out period, if all other MADE SAFE Certification requirements are met, the product is eligible for Provisional Use of the Seal.

Most ineligible substances do not qualify for Phase Out. Ineligible substances that can be swapped or removed immediately, are ineligible due to high-order toxicity issues, or fail to meet other Provisional Use requirements are not eligible for Phase Outs.

Provisional Use of the Seal requirements must be met by the deadline set forth by MADE SAFE and companies must agree to all terms of Provisional Use of the Seal. Failure to meet the deadline or to comply with the requirements results in Decertification of the product in question.

Packaging: Use of the seal on packaging must be submitted for approval by the MADE SAFE team before use. Additionally, companies must follow the most up-to-date International Nomenclature for Cosmetics Ingredients (INCI) labeling requirements for applicable product categories as well as keep a commitment to ingredient transparency.

Maintaining MADE SAFE Certification

In addition to the MADE SAFE Ecosystem Approach screening process, substance determinations and MADE SAFE Certified products are reviewed annually through two mechanisms: Annual Product Compliance and the Toxicant Database Amendment Process. In addition, companies are required to submit all ingredient changes to MADE SAFE – including changes in formulation and changes in sourcing – to MADE SAFE before those changes are made to certified products throughout the year via Ad Hoc Compliance.

MADE SAFE Toxicant Database Amendment Process Overview: Each year in Q3 and Q4, substances requiring reassessment will be gathered and reviewed by the MADE SAFE Science & Research Team. After completing the reassessment, if any determinations are changed (meaning a designation changes from permitted to restricted, or vice versa), an amendment will be made to the Toxicant Database.

MADE SAFE Annual Product Compliance Overview: MADE SAFE Certified products are reviewed each year beginning in Q2 to ensure that they comply with MADE SAFE standards in terms of transparency and labeling, formulation changes, and phase-out of substances as a result of the Toxicant Database Amendment Process from the previous year, when applicable.

Ad Hoc Compliance Overview: MADE SAFE Certified products are certified "as-is" at the time of certification, in regard to the ingredients/materials and their sources that are currently in use when the product was granted use of the seal. If any changes are made to the formulation – including source additions, source changes, ingredient/material additions, or ingredient/material deletions – MADE SAFE must be informed immediately and updates must be approved by MADE SAFE *before* changes are made to the formulation. Companies must notify MADE SAFE in writing at least 30 days before any change in manufacturing takes effect.

Toxicant Database Amendment Process Details

As a result of ingredient determination reassessments, amendments to the existing Toxicant Database may be made one time per year during Q1 (except in extraordinary situations).

MADE SAFE collects scientific data, industry practice information, and contamination risk information about substances on a rolling basis (from October 1 to September 30 of the next year). When new information is presented that may change an existing determination, that substance is added to the Priority Substance Reassessment List.

As a courtesy, the Priority Substance Reassessment List is announced in Q4, so that companies have advance notice of substances up for reassessment at that time. This notification is a courtesy to our companies to inform them that a change in Priority Substances' determinations *may* be coming in Q1 the following year. Notification that a substance has been placed on the Priority Substance Reassessment List *does not mean that the substance's determination is guaranteed to change*; notification means only that it will be reassessed.

Each year during Q4, substances on the Priority Substance Reassessment List are reviewed by the MADE SAFE Science & Research team. In this process, the MADE SAFE team may review all available and relevant scientific literature and data, consult industry experts and scientific advisors, and/or research other relevant information. If after reassessment of a substance its determination is changed, an Amendment to the Toxicant Database is made to reflect the updated determination; these updates are referred to as Toxicant Database Amendments and denoted by the year they are announced. Ingredients or materials with amended determinations are referred to as Amended Substances.

All companies working with MADE SAFE are notified of all new Toxicant Database Amendments once they are finalized in Q1. At that time, all companies using newly prohibited Amended Substances have until the end of Q1 of the following year to reformulate and remove the ingredient, unless otherwise specified. Some substances may be given longer or shorter phase-out periods. All companies using substances with updated documentation requirements must furnish documentation as soon as possible; the final deadline is 3 months from the date of notification.

As part of the Annual Product Compliance process that begins in Q2, MADE SAFE confirms that all Amended Substances have been removed by the associated deadlines. (If a swap is necessary, MADE SAFE must evaluate all swap candidates to ensure they are approved.)

If, as a result of reassessment, ingredients or materials are now permitted that were once not allowed, companies will also be notified. Companies may begin using those substances only after they've been screened and approved as MADE SAFE. This process follows the normal MADE SAFE certification requirements, including submission of all necessary paperwork, payment of associated fees, and full screening of the substance in question.

Annual Product Compliance Process Details

Annual Product Compliance verifies that MADE SAFE's listing of certified products is up-to-date and all certified formulations and sources MADE SAFE has on file remain accurate. In this process, each company offering certified products submits a compliance form filled out to the best of their knowledge to inform MADE SAFE of any changes to: ingredients/materials within MADE SAFE Certified products, ingredient/material sources, product names, and/or product offerings.

MADE SAFE also utilizes this mechanism to address companies that are out of compliance with any number of MADE SAFE's standards and requirements. These include, but are not limited to, non-compliance with labeling requirements for fragrance or flavor, undisclosed reformulations, undisclosed changes in sourcing, unresolved issues from the Toxicant Database Amendment Process, pending Provisional Use of the Seal screening projects, and any other compliance issues.

Companies who are not in compliance with any MADE SAFE standards and requirements are given a deadline to remedy any issues. Deadlines are determined on a case-by-case basis and are dependent on complexity and severity of the offense, while also maintaining the integrity of the MADE SAFE seal.

Ad Hoc Compliance Process Details

MADE SAFE Certified products are certified "as-is" at the time of certification, in regard to the ingredients/materials and their sources that are currently in use when the product was granted use of the seal. If any changes are made to the formulation – including source additions, source changes, ingredient/material additions, or ingredient/material deletions – MADE SAFE must be informed immediately and updates must be approved by MADE SAFE *before* changes are made to the formulation.

Ingredients and materials within MADE SAFE Certified products are approved on a source-by-source basis. This means that in order to change or add an ingredient/material source, the substance from a new source must be approved by MADE SAFE before it can be used in certified products.

If a company is found to be out of compliance by utilizing ingredients or sources that are not reported and approved by MADE SAFE, MADE SAFE will first work with the company to determine if the new ingredient/material or source can be approved for use. If it cannot be approved for use,

the company will be given the opportunity to remove or swap the substance for a compliant substance.

If the company cannot or will not remove or swap the substance in question, MADE SAFE will begin the process of Decertification. Note that screening fees apply for Ad Hoc Compliance screenings.

Random and Systematic Product Testing: MADE SAFE reserves the right to select products randomly or systematically to undergo testing. MADE SAFE may elect to randomly choose products for testing to ensure that products are compliant with various criteria. MADE SAFE also reserves the right to systematically test products or require testing of products, when there is concern that specific criteria are not being met.

Disclaimer

This document is a publication of Nontoxic Certified. Although thorough, MADE SAFE Certification Standards and Guidelines may have additional requirements where determined necessary due to new findings.