

Standard Operation Procedure for Submission and Approval of Group Test Form

1. Purpose

This standard operation procedure is intended to outline the procedure for Kroger Co. vendors and factories to complete and submit Group Test Form (GTF) and for labs to review and approve Group Test Forms.

2. General Process:

Vendors and suppliers need to fill out a group test form following the guideline in Section 3 and submit to Bureau Veritas Laboratories as specified in Section 4. BV will review and approve proposed GTF on behalf of Kroger.

3. Completion of GTF

- 3.1 Each GTF must contain items of similar product type, material type, manufacturing processes from the same factory.
- 3.2 Detailed and accurate product description, materials and colors must be included in the "Grouping Request Justification" column (see examples 1, 2, 3, 4 and 5 below).
- 3.3 All materials and colors must be listed (see example 5).
- 3.4 Each group must contain one primary Item that will be fully protocol tested.
- 3.5 In the "Proposed Protocol" column, add the protocol number for "full testing" items only (see example 1, 2, 3 or 4 below)
- 3.6 If no test is needed on an item, leave the proposed protocol blank and add the "X" mark in the column "grouped no testing required" column and note "assorted with XXXX" (see example 4)
- 3.7 If more than one item is identified as needing full protocol testing within the same group, the same protocol number must be used for testing. Place additional protocol testing in a separate GTF.
- 3.8 Each submitted item must be identified as requiring full protocol testing, partial testing, or no testing. Partially tested items must identify what tests should be applied (i.e. lead test green color) See below in example 1.
- 3.9 In the Grouping Request Justification column, add all additional information needed for lab to determine that a product will be compliant.
- 3.10 As needed, assign numbers to the pictures and make a note in the group test justification column (see example 1).
- 3.11 If multiple groupings are necessary, each group must be listed on a separate GTF.

- 3.12 For Battery operated items (example 2), the following information need to be on GTF
 - type and size of batteries;
 - number of batteries;
 - whether batteries will be included with shipping or not;
 - if battery is button type, add in "Group Request Justification" column verifying that battery cover is screwed down type.
 - Include pictures of battery compartment open and closed
- 3.12 For lights: (Example 3), UL# or ETL# must be included.
- 3.13 When applicable, include the type of light bulbs in product (examples 2 and 3)
- 3.14 Toys physical-mechanical must be conducted on each product and cannot be grouped. Toys and Children's product grouping requires additional approval by the Kroger Compliance Team.

4. Submission of GTF

- 4.1 Each submission shall only include one group.
- 4.2 GTFs submitted to the lab must reflect all Items whether tested or not.
- 4.3 GTFs must be submitted to the lab where testing will be conducted.
- 4.4 Clear resolution product pictures from front and back are required to be submitted to the lab along with GTFs. Pictures from other angles and in high resolution are recommended, as needed, to clearly demonstrate the nature of the products.
- 4.5 All information contained in the GTF submittal form must be complete and accurate.
- 4.6 Any discrepancies will result in delays in approval and/or testing.
- 4.7 Upon submission of physical samples, the lab may evaluate and require a change to testing, due to variance in detail that was not available in photographs and/or in description on the group form.

5. Review and Approval

- 5.1 Bureau Veritas Laboratories will review and approve proposed GTF on behalf of Kroger. BV can request additional information from testing applicants in order to appropriately assess the submission.
- 5.2 Upon approval, the lab will sign and date GTF and send back to the applicant.
- 5.3 The request applicant will confirm to lab that they agree to proceed with tests based on approved GTF.
- 5.4 Turn-around time for review of proposed GTF is 3 working days. Vendors and labs should cooperate to complete the review and approval within 7 working days

For questions, please contact Kroger General Merchandise Compliance team at GMGTF@kroger.com.

Appendix

- A1. Items with whimsical patterns, such as dinnerware, drinkware, blanket throws and others, will be tested as children's items. Whimsical dinnerware serving pieces will be excluded from children's testing.
- A2. Requests for existing test extensions will be submitted to the Kroger compliance team prior to group form submission to the lab.
- A3. Dishes/bowls with a seasonal décor element such as Easter, Valentine, Halloween or Christmas MUST pass FDA testing. Non-seasonal Décor bowls and dishes for class code 874 must follow FDA proper not for food use label rules for ceramic.
- A4. Non-ceramic dishes and bowls for Décor class 874, including leafed glass and other materials will follow an FDA not for food use label and a permanent mark or permanently glued label.
- A5. Class code is found on the Kroger Fred Meyer division purchase order only or via email from the buying team.
- A6. Pitchers must pass FDA testing, refer exception requests to Kroger Compliance team.
- A7. Birdhouses are tested to outdoor décor if listed as class code 875 and tested as houses for real birds if listed as class code 886.
- A8. FCC documentation, where applicable, will be submitted to the lab.
- A9. ETL or UL certificate number must be current for the factory before test submission. Electric items without UL or ETL listing will not be accepted.

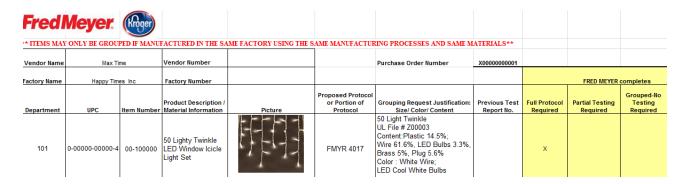
EXAMPLE 1 : GTF Form

Fred Meyer.									
** ITEMS MAY	ONLY BE GROU	PED IF MANU	FACTURED IN THE SA	ME FACTORY USING THE S	AME MANUFACTURE	NG PROCESSES AND SAME MA	TERIALS**		
Vendor Name	Luck	rys	Vendor Number			Purchase Order Number	Z00000000001		
Factory Name	Handy Hard	Iware Inc	Factory Number						FRED MEYER o
Department	UPC	Item Number	Product Description / Material Information	Picture	Proposed Protocol or Portion of Protocol	Grouping Request Justification: Size/ Color/ Content	Previous Test Report No.	Full Protocol Required	Partial Testing Required
100	000000-000001	0000- F- 0000	Metal Round Container 2 Clrs Ast		FMYR 3525	Test only one color - Charm #2 Size: Dia.4" x 3.5"H x Dia 3" Colors: Red #1, Charm #2, Content: 100% Metal		X Style #1	Lead Test Style #2
				1 2					

EXAMPLE 2: GTF Battery operated items

	FredMeyer. ***ITEMS MAY ONLY BE GROUPED IF MANUFACTURED IN THE SAME FACTORY USING THE SAME MANUFACTURING PROCESSES AND SAME MATERIALS***								
** ITEMS MAY O	NLY BE GROUPED	IF MANUFACTU	RED IN THE SAME FA	CTORY USING THE SAME MAN	UFACTURING PROCES	SSES AND SAME MATERIALS*	*		
Vendor Name	Max 1	Γime	Vendor Number			Purchase Order Number	X0000000001		
Factory Name	Happy Tir	mes Inc	Factory Number						FRED MEYER co
Department	UPC	Item Number	Product Description / Material Information	Picture	Proposed Protocol or Portion of Protocol	Grouping Request Justification: Size/ Color/ Content	Previous Test Report No.	Full Protocol Required	Partial Testing Required
102	0-00000-00000-4	00-100000	LED Lighted Musical Tabletop Décor w/LED color changing light		FMYR - 4491	Content: plastic 95%; bulb 5% Size: 11.5" LED Light On-Off Switch + Try Me Button Battery: 3 X 'AAA' (included) Color: White		х	

EXAMPLE 3: GTF Light Strings



EXAMPLE 4: GTF Candle9/28/20179/29/2017 10:14:00 AM

Fredi	Meyer.	Kroger								
** ITEMS MAY ONLY BE GROUPED IF MANUFACTURED IN THE SAME FACTORY USING THE SAME MANUFACTURING PROCESSES AND SAME MATERIALS**										
Vendor Name	Max Ti	ime	Vendor Number			Purchase Order Number	X00000000001			
Factory Name	Handy Tim	es Inc	Factory Number						FRED MEYER	completes
Department	UPC	Item Number	Product Description / Material Information	Picture	Proposed Protocol or Portion of Protocol	Grouping Request Justification: Size/ Color/ Content	Previous Test Report No.	Full Protocol Required	Partial Testing Required	Grouped-No Testing Required
106	0-00000-000000-6	A100002P	HD 3X6 EMBOSSED LEAF PILLAR CANDLE		FMYR-9400	colour:Green Size: 3X6		х		
106	0-00000-000001-7	A100002Q	HD 3X4 EMBOSSED LEAF PILLAR CANDLE			colour:Green Size: 3X4 same material and color as item #A100002P, But a different height, no need to do the test,				Х

EXAMPLE 5: GTF Plastics

	TECHNOLOGY TO THE SAME FACTORY USING THE SAME MANUFACTURING PROCESSES AND SAME MATERIALS**									
Vendor Name	Housewares Forev		Vendor Number Factory Number	1008 94067602		Purchase Order Number	910-00000, 910-0	0001, 700-00000, 5		
Department	UPC	Item Number	Product Description	Picture	Proposed Protocol or Portion of Protocol	Grouping Request Justification/Materials	Full Protocol Required	Partial Testing Required	Grouped-No Testing Required	
	0-00000-00000-0	1001	21 oz Insulated Drink Cup w/Screened Art in Blue Beach Theme		FMYR-6013, 6001 / Full test	Lid (ABS) Blue, Gasket (Silicone) Clear, Inner Cup (Tritan) Clear, Outer Cup (Tritan) Clear, Straw (PP) Blue, O-ring (PP) Blue	X Full test			
	0-00000-00000-1	1002	21 oz Insulated Drink Cup w/ Screened Green and Multi Floral Theme		KRGR-6013, 6001 / Partial test	Lid (ABS) Green, Gasket (Silicone) Clear, Inner Cup (Tritan) Clear, Jurer Cup (Tritan) Clear, Straw (PP) Green, O-ring (PP) Green, O-ring (PP) Green, Oste: Clear Silicone Gaskets same for all styles; Clear Tritan is the same for all styles		Full test compontents and Exterior cup Art work except as noted in grouped no testing,	Inner cup, and outer cup Tritan	

Revision History			
Date	Reversion	Prepared by	Approved by
04/26/16	New Issue	Kathy Payne	Megan Liu
09/28/2017	Editorial update on Section 3	Kathy Payne	Megan Liu