Wise List powered by MADE SAFE™Certification Standard

V-1.2(2024)

Wise List Powered by MADE SAFE

Until now, there is no singular approach or definition of “green” for companies to follow in the climate friendly realm. As a result, generic terms like “clean,” “eco,” “natural,” and claims of “free from” certain chemicals have proliferated, confusing the marketplace and diminishing the chance to eliminate truly harmful chemistries. This is tough on companies as well as consumers.

By adhering to the Wise List powered by MADE SAFE companies demonstrate their commitment to help eliminate the use of 15,000 harmful chemicals (as intentionally added ingredients) in certified products. This helps green companies move in a reasonable and measured way toward removing the most harmful chemicals from products, even in the absence of legislation.

This standard provides guidance for companies to adhere to that ends the confusion around green claims. Until now there hasn't been an established clear baseline. The Wise List powered by MADE SAFE will fast become the standard for being “green” in the marketplace.

The Wise List powered by MADE SAFE is a bold and urgent step toward cleaner air, water, and soil and cleaning up the chemicals that unfairly disadvantage front and fenceline communities.

The Wise List powered by MADE SAFE, is designed to hasten and facilitate the elimination of the worst chemicals in everyday products while creating a common standard for eco-products.

Wise List Certification Scope

The following product categories are within the scope of Wise List Certification under version 1.2:

1. Baby & Child
    a. Diaper cream
    b. Personal care

2. Cleaning + Laundry Products (formulated)
3. Cosmetics
4. Hand Sanitizer
5. Home Fragrance
    a. Candles
    b. Room spray
    c. Air fresheners
6. Insect Repellent
7. Oral Care
8. Perfume
9. Personal Care
    a. Skincare
    b. Bath & body products
    c. Hair care
10. Pet Care (formulated)
11. Remedies / Wellness
12. Sexual + Intimate Health Products (formulated)
13. Sunscreen
14. Supplements

The following product categories are outside of the scope for Wise List Certification under version 1.2, though may be areas of expansion for the future:

1. Apparel
2. Bedding + Linens
3. Building Materials
4. Cookware
5. Diapers
6. Food
7. Food Contact Goods
8. Furniture
9. Mattresses, Pillows + Toppers
10. Medications and Medical Products (exceptions: OTC acne care, sunscreen)
11. Period Care
12. Wipes

Definition 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.

Reported ingredients/materials/substances: Companies must submit all known ingredients, materials, and substances in each product undergoing certification for review. In addition to companies' submission forms containing self-reported substances, Wise List 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.

Wise List powered by MADE SAFE Certification Overview

The Wise List powered by MADE SAFE is an independent third-party review that determines that products undergoing screening do not contain intentionally added ingredients on the Wise List of over 15,000 substances.

The Wise List bans or restricts over 15,000 harmful substances including, but not limited to:

- Toxic antibacterials + antimicrobials
- Harmful artificial colors + dyes
- Bisphenols
- Carcinogens
- Endocrine disruptors
- Developmental and reproductive toxicants
- Neurotoxicants
- Formaldehyde releasers
- Heavy metals
- High-risk pesticides
- PCBs
- PFAS
- Paraffin oil, paraffin wax, petrolatum + liquid paraffinum ingredients
- Parabens
- Phthalates
- Harmful UV blockers + filters
- Harmful VOCs

Wise list 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 Wise List certification is primarily a paper screening, we rely on companies to accurately and completely disclose and report added ingredients and materials to us during the submission process. Additionally, Wise List requires composition disclosures for submitted substances from ingredient/material manufacturers to increase substance disclosure accuracy.

The Wise List Screening Process

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. **The Wise List Powered by MADE SAFE Screen:** Reported substances are first screened against the Wise List powered by MADE SAFE. The Wise List is a compilation of dozens of authoritative lists from around the world. The lists cover a wide array of toxicity endpoints that include both human health and environmental health. While the sources that comprise the entirety of the list are proprietary, some example sources are listed below:

    - Agency for Toxic Substances and Disease Registry (ATSDR) Substance Priority List
    - California Proposition 65
    - chemsec SIN List
    - Environment Canada Persistence, Bioaccumulation and Inherent Toxicity
    - European Chemicals Agency (ECHA) Cosmetic Products Regulation, Annex II - Prohibited Substances
    - European Union European Commission Carcinogenic, Mutagenic Or Toxic for Reproduction (CMR) Substances
    - European Union European Commission Endocrine Disruptor Priority List

- European Union European Commission Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) Substances of Very High Concern (SVHC)
- European Union European Commission Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) Annex XVII
- Health Canada Cosmetic Ingredient Hotlist
- International Agency for Research on Cancer (IARC) Monographs on the Identification of Carcinogenic Hazards to Humans
- Pesticide Action Network International List of Highly Hazardous Pesticides
- Silent Spring Institute Mammary Carcinogens List
- State of Washington Department of Ecology Chemicals of High Concern to Children (CHCC)
- Stockholm Convention on Persistent Organic Pollutants (POPS)
- U.S. Food & Drug Administration (FDA) Prohibited & Restricted Ingredients in Cosmetics

If a substance is found on the Wise List, it is typically not eligible for certification. If a substance is not found on the Wise List, it progresses and undergoes additional screening in the 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.

4. **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.

   Companies must provide documentation for each ingredient demonstrating compliance with requirements.

   - **Complete Composition Declaration:** Required for all ingredients and materials. Documentation that accounts for the entire composition of an ingredient or material. This document should explicitly list each sub-substance or verify the substance is only one single substance or material.
   - **Extraction Method Documentation:** Required for select ingredients and materials. Documentation disclosing the extraction method(s) used in manufacturing a substance.
   - **Non-nanomaterial documentation:** Required for select ingredients and materials. Documentation that demonstrates that the material in question is not a

nanomaterial. Lab testing must demonstrate that the material's primary particle size is larger than 100 nanometers.
- **Final Product pH:** Required for select ingredients and materials. Documentation disclosing the final pH of the product undergoing screening.
- **Other Documentation:** Additional documentation may be required on a case-by-case basis.

5. **Final Report Issue:** The company undergoing screening is issued a final report containing results.

   For products not eligible for Wise List powered by MADE SAFE Certification, companies are provided 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 Red List powered by MADE SAFE seal is awarded. At this point, Companies may work with the MADE SAFE team to announce certification.

Package Labeling Requirements

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 Wise List certified products must be disclosed. Companies are required to disclose fragrance and flavor ingredients occurring at or more than 100 parts per million.

There are numerous options for disclosure to meet this requirement:

- **Disclosure on the product's packaging:** The fragrance is disclosed on the packaging of the product in question. This option is preferred and recommended.

- **Disclosure on the product's webpage:** The fragrance is disclosed on the designated webpage for the product in question. This option is not recommended but is considered acceptable.

- **Disclosure of fragrance/flavor ingredients in a master list on the company's webpage:** All fragrance/flavor ingredients within 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.

Companies undergoing Wise List 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 Wise List 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 Wise List Seal & Packaging

Proper Seal Use: The Wise List powered by 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 Wise List seal may not be modified or edited, except for color selection for packaging and marketing. Only products that have earned Wise List Certification or Provisional Use of the Seal may wear the Wise List seal. Companies achieving Wise List 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 Wise List 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 Wise List 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 Wise List 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 Wise List 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 (outlined above).

Maintaining Wise List Certification

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

Wise List 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 Wise List.

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

Ad Hoc Compliance Overview: Wise List 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.

Wise List Amendment Process Details

As a result of ingredient determination reassessments, amendments to the existing Wise List 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 Wise List is made to reflect the updated determination; these updates are referred to as Wise List

Amendments and denoted by the year they are announced. Ingredients or materials with amended determinations are referred to as Amended Substances.

All companies working within the Wise List program are notified of all new Wise List 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 according to Wise List standards.)

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 Wise List compliant. This process follows the normal Wise List 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 Wise List'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 completes a compliance audit filled out to the best of their knowledge to inform MADE SAFE of any changes to: ingredients/materials within Wise List 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 Wise List'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 Wise List Amendment Process, pending Provisional Use of the Seal screening projects, and any other compliance issues.

Companies who are not in compliance with any Wise List 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 Wise List seal.

Ad Hoc Compliance Process Details

Wise List 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 Wise List 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 before it can be used in Wise List certified products.

If a company is found to be out of compliance by utilizing ingredients or sources that are not reported and approved in the Wise List, 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, Wise List Standards and Guidelines may have additional requirements where determined necessary due to new findings.