MEIJER VENDOR GUIDANCE
How to Use WERCSmart and PurView for Meijer Chemical Policy Evaluations

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I. OVERVIEW – MEIJER'S BRAND EVALUATION PROGRAM

Meijer Vendors will have in-scope products evaluated using criteria Meijer has adopted for national and own-brand products as part of Meijer's Safer Chemical Program. This program supports the commitment Meijer has made to promote the use of safer chemicals, materials, and products across its supply chain.

All products that require an SDS under United States Occupational Safety and Health Administration (OSHA) hazard communication rules are to be registered through UL WERCSmart.

Only the following in-scope **formulated** categories are currently subject to Meijer's Safer Chemical evaluation program within UL Purview:
- o Health & Beauty
- o Cleaning Supplies
- o Baby Products
- o Personal Care Products

Softlines, Paper Products, Food Packaging and Pet Food and Pet Products are within scope for the Safer Chemicals Program but these products are not currently evaluated through UL WERCSmart or UL Purview.

This overview summarizes the key aspects of Meijer's Safer Chemical evaluation program. Sections II – VII provide detailed instructions about how to obtain UL WERCSmart and PurView systems access, how to contribute data about your products, and how to review and resolve any issues that impact your brand evaluation results.

The following criteria must be met for all in scope products registered into UL WERCSmart:
1. Supplier has registered its products' formulations on WERCSmart and associated every UPC sold at Meijer with a formulation registered on WERCSmart.
2. Supplier has granted Meijer consent to Data Use Tiers 2.1, 2.2 and 4.1.
3. Every product (including any third-party component) must be fully screenable – formulation cannot contain generic ingredient names (e.g., fragrance) or unconsented third-party components.

Own-brand and national brand products are subject to different chemical screens:
1. Own-brand products cannot contain any Meijer High Priority Chemical or any chemical on Meijer's Extended Restricted Substances List.[1]
2. National-brand products cannot contain any Meijer High Priority Chemical.

The PurView platform provides suppliers with access to evaluation results for their products. See Section IV for instructions about how to interpret your results. See Section V for actions required to remedy the various reasons for failing an evaluation. If the reasons involve missing Tier consents or the product's formulation, you will need to provide additional data to WERCSmart for your product to be re-evaluated. Do NOT attempt to create any records directly on PurView – all product and formulation information in PurView must be derived from a WERCSmart record.

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[1] See https://www.ulpurview.com/PurviewUI/Catalogs/856/Ingredients/ratings/1 and https://www.ulpurview.com/PurviewUI/Catalogs/853/Ingredients/ratings/1 .

Please reach out to ChemicalManagement@meijer.com if you have questions about our evaluation program. If you need technical assistance with how to resolve a reason for failing to pass an evaluation, you can reach out to UL Solutions by clicking on the Contact Us link in the footer of any PurView page, selecting Other Questions and sending your question via the Comments area.

II. GRANT CONSENT TO MEIJER TO USE YOUR WERCSMART DATA

Meijer requests that its vendors consent to Data Use Tiers **2.1, 2.2** and **4.1**. This data use will allow Meijer to implement its Chemical Policy and to evaluate products against Meijer's Safer Chemical evaluation criteria.

1. Consent for **Tier 2.1** involves chemical screening and aggregate chemical usage reports. Meijer requires Tier 2.1 consent to
    *   Screen for the presence of chemicals included in chemical screens and to provide a pass/fail status
    *   Screen for the presence of generic ingredients like fragrance which cannot be screened for specific chemicals
    *   View aggregate usage reports which summarize the prevalence or volume of chemicals in a supplier's product portfolio

2. Consent for **Tier 2.2** provides the chemical identities of publicly disclosed ingredients and product transparency ratios. Meijer requires Tier 2.2 consent to:
    *   Obtain the standard chemical name and chemical abstract numbers (CAS#) for each ingredient on a product's publicly disclosed ingredient list
    *   Track progress towards chemical transparency
    NOTE: under no circumstances will Meijer receive *percent formulation* details of your products.

3. Consent for **Tier 4.1** authorizes the public disclosure of results from our brand evaluations. Meijer will only publish information that highlights the positive attributes of products.

4. Consent for **Tier 3** authorizes a retailer to collect additional information from suppliers via PurView surveys to perform sustainability evaluations. Meijer **does not require** Tier 3 consent.
If you have any questions about why Meijer seeks your consent for specific data uses, or about the consequences of not participating in this program, please contact the Meijer Buyer assigned to your product category.

To grant these consents, go to your company's dashboard in WERCSmart and select Retail Partners. On this page, your WERCSmart manager will see Meijer's requests as well as requests from any other retailers operating similar programs where you are also a supplier:

Select Meijer to review our specific requests:
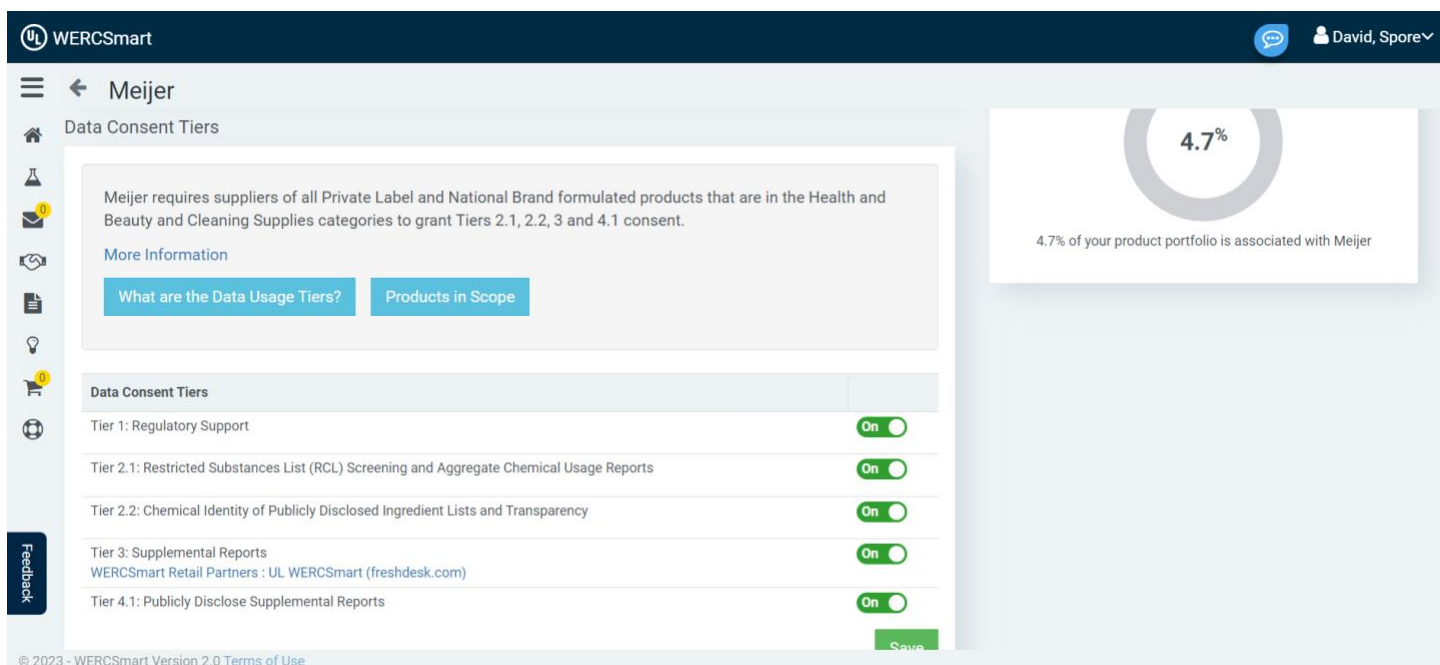
III. CHECK YOUR WERCSMART AND PURVIEW DATA

1. WERCSMART DATA

Your WERCSmart formulation records provide critical data used in Meijer's evaluations, so it is important to check their currency and data quality. Registrations may have occurred years ago and may no longer reflect current formulations or may lack new data elements that have been added to the WERCSmart system over time.

Meijer recommends that vendors <u>audit their WERCSmart records</u> to confirm that:

1.   Every UPC sold at Meijer is associated with a formulation registered on WERCSmart.
2.   The ingredient list for each formulation is up-to-date and complete. If this list includes generic ingredient names such as "fragrance" or "flavor," see Section V.2 for instructions about how to replace generic ingredient names with full ingredient disclosure.
3.   The public disclosure status of each ingredient is correctly set.
4.   Each product record on WERCSmart is complete and includes essential data elements Meijer relies upon for managing its assortments (e.g., brand).
5.   If your product is a Meijer own-brand, indicate "Yes" in the WERCSmart field "Product is a Retailer's Private Label or Brand."

Ingredient disclosure status is particularly important because it controls the visibility Meijer has into the chemical composition of any given product. In order to meet our chemical policy objectives, every intentionally added ingredient that is disclosed on a product label or webpage should be marked as "publicly disclosed" in WERCSmart.

You initially provide this information during the process of creating a Product Formulation:

For each ingredient you enter into a formulation, **set the "Publicly Disclosed?" field to "Yes" if your company discloses that ingredient's identity on a product label or webpage or SDS**. If an ingredient is not marked as publicly disclosed, its name and CAS# will not be disclosed to Meijer but it can still be screened by UL to determine if it is on a Meijer chemical list.

You can set the "Trade Secret?" field to "Yes" if the ingredient meets relevant requirements for being so designated. Since trade secrets are confidential business information, the system will not allow you to set a trade secret ingredient to "publicly disclosed." If an ingredient is marked as "Trade Secret," its name and CAS# will not be disclosed to Meijer but it can still be screened by UL to determine if it is on a Meijer chemical list.

For all product registrations, WERCSmart provides a "My Ingredients" popup from any formulation page to manage the public disclosure status of ingredients in your formulations in one location. Once you set the disclosure status of an ingredient in My Ingredients, you can retroactively update the status of that ingredient in all your existing product registrations as well as pre-populate this data in new formulations you create.
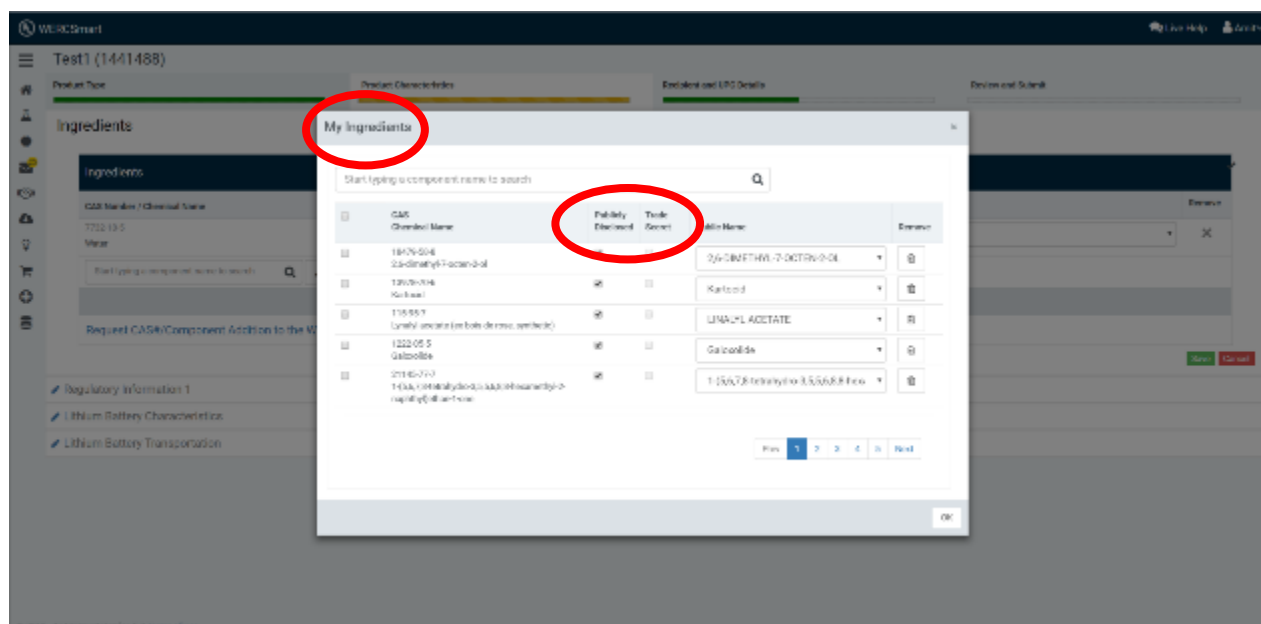
2. **PURVIEW DATA**

UL's PurView system allows you to review the results of Meijer's product evaluations and troubleshoot what additional action may be needed to receive a positive evaluation. Meijer provides its vendors with no-cost access to PurView so that they can view their product data and the results of Meijer's evaluations.

To be set up as a new user with access to PurView, please

1) Create a UL.com account by going to https://www.ul.com/software/ultrus/product-supplier-scorecard and follow the Log In button.
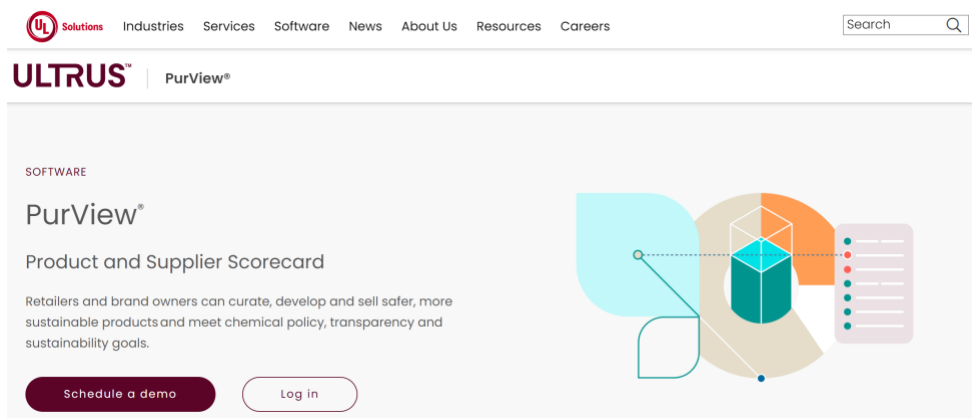
2) You will be redirected to a UL login screen where you will need to **create a new account**, validate your email address, and set a new password.

UL Solutions Account

Create your password

✓ Email address verified. You can now continue.

First name

Enter first name

Last name

Enter last name

Password

****

Your password must:

- Be between 8 and 64 characters in length
- Contain at least 1 lowercase and 1 uppercase letter
- Contain at least 1 number (0-9)
- Contain at least 1 special character (e.g. !"#$%&'()+<=)

Confirm your password

****

Register

3) Once validated, you will need to request access to the Meijer catalog on PurView. Click on the Contact us link and fill out the form indicating a New User request for your company and select the relevant retailer program.

Welcome to Purview

You currently do not have access to Purview. Please contact us to request for access.

Contact Us ✕

Name

Example User

Email

example@user.com

Topic

New User Request For Retailer Chemical Policy ⌄

Company

TEST WERCS 123 ▾

Retailer Program

Target ⌄

| Select target program... |
| Target |
| Walmart |
| Meijer |

Cancel   Send message

4) You will receive an email from PurViewSupport@wercsmart.ul.com containing a link to PurView. For security, links are **valid for 48 hours**. New links can be requested by replying to the invite link. Once logged in, select the retailer dropdown and 'View' to bring you to the relevant retailer's program catalog.
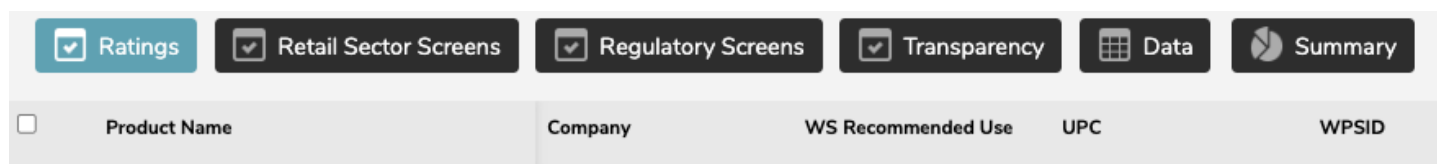
After initial account setup, you can access the catalog directly by using this link
https://www.ulpurview.com/PurviewUI/Catalogs/858

5) If you still do not see a requested retailer catalog, either use the Contact Us button at the bottom of the page

or send an email to PurViewSupport@wercsmart.ul.com

After you log in to PurView, you will see your dashboard, which will contain records for any in-scope UPCs in WERCSmart that you have associated with Meijer.

☑ Ratings	☑ Retail Sector Screens	☑ Regulatory Screens	☑ Transparency	⊞ Data	◑ Summary

☐	**Product Name**	**Company**	**WS Recommended Use**	**UPC**	**WPSID**

The dashboard (above) is comprised of the following tabs:
- *Ratings* displays summary data from WERCSmart about each in-scope UPC and reports the results of Meijer's chemical screening and brand evaluations
- *Retail Sector Screens* displays the results of various retailer and sector screens
- *Regulatory Screens* displays the results of regulatory screens run against your product formulations
- *Transparency* displays the results of ingredient transparency assessments
- *Data* displays the raw product data obtained from you on WERCSmart

From Product Name, you can click down to the full details of each product record.

Meijer recommends that vendors <u>audit their PurView records</u> to confirm that:

1. Every UPC sold at Meijer in in-scope product categories has a record in the PurView catalog.
2. Data elements that Meijer requires (Brand, Private Label Brand?) are being populated from your WERCSmart records. If any data are missing or incorrect, make the necessary updates in the product's WERCSmart record – you cannot edit WERCSmart-derived fields in PurView.

IV. REVIEW RESULTS OF MEIJER'S BRAND EVALUATIONS

Meijer reviews the results of its chemical screening and product evaluations on PurView's Ratings tab. Meijer provides its vendors with no-cost access to PurView so that they can also view the assessments that Meijer receives. While Meijer sees results from all of its vendors, each vendor only sees results for their specific products.

The PurView Ratings tab will indicate for each of your products how it has been evaluated against Meijer's brand criteria:

National Brand Evaluation	Own Brand Evaluation	Reasons For Failure
✅	—	N/A
❌	—	Contains unscreenable generic
—	❌	Contains unscreenable generic,Contains Meijer Extended RSL Chemical(s)
—	✅	N/A

1. MEIJER BRAND EVALUATION REQUIREMENTS

The Brand Evaluation columns inform you whether your product passes or fails Meijer's evaluation criteria.

1. **Pass** (Green Check) – Your product receives a positive evaluation based on Meijer's brand evaluation criteria:
   a) Product (including any third-party component) passes the generic ingredient screen and is fully screenable
   b) Product (including any third-party component) passes the relevant Meijer chemical screen(s)
      i) National brand product does not contain any chemicals on the Meijer High Priority Chemical List
      ii) Own-brand product does not contain any chemicals on either the High Priority Chemical List or the Meijer's Extended RSL list

2. **Fail** (Red X) - Your product does not pass Meijer's brand evaluation for one or more of the following reasons:
   a) Product contains one or more unscreenable generic ingredients
   b) Product contains one or more unscreenable, unconsented 3rd Party Components
   c) Product contains one or more chemicals on Meijer's High Priority Chemical List
   d) Product contains one or more chemicals on Meijer's Extended RSL List
   e) Product contains an unscreenable generic in a 3rd Party Component
   f) Product contains an unconsented 3rd Party Ingredient
   g) Product contains one or more chemicals on High Meijer's High Priority Chemical List in a 3rd Party Components
   h) Product contains one or more chemicals on Meijer's Extended RSL List in a 3rd Party Component

The column titled "Reasons for Failure" will indicate which specific evaluation criteria are preventing the product from passing and whether that failure is occurring in the primary product formulation or in a third-party component.

2.   MEIJER CHEMICAL SCREENING RESULTS

Meijer screens formulated products against two lists of chemicals in its brand evaluation program.

If you have consented to Tier 2.1, UL is authorized to screen the full ingredient lists in your WERCSmart formulation records and report pass/fail screening results to Meijer. If one of your products contains an ingredient on a chemical screen, UL can share the chemical identity of that ingredient with Meijer **only if** you have marked that ingredient as "publicly disclosed." If the unwanted ingredient is not publicly disclosed, UL only shares whether the product passes/fails the screen with Meijer in order to protect the confidentiality of your formulations.

Examples illustrating the potential results of Meijer's chemical screening are presented below:

Alert: Not Fully Screened on WS	Publicly Disclosed Generic Ingredient	Free of Meijer High Priority Chemicals	Publicly Disclosed Meijer High Priority Chemicals	Free of Meijer Extended RSL Chemicals	Publicly Disclosed Meijer Extended RSL Chemical(s)
–	–	✓	–	✓	–
⚠	Fragrance	✓	–	✗	Palm oil
⚠	flavor	✓	–	✗	Cocamidopropyl betaine
–	–	✓	–	✓	–

You can see the possible results of Meijer's screening:

Alert – Not Fully Screened on WS

This alert (Yellow Exclamation Point) informs you that the product's formulation could not be fully screened on WERCSmart for Meijer chemicals because it contains one or more generic ingredients or unconsented third-party components. The product will fail both of Meijer's brand evaluations until full formulation details are provided via WERCSmart.

Free of Meijer High Priority Chemicals

This field informs you whether a product's formulation passed WERCSmart screening for ingredients on Meijer's High Priority Chemical list.[2] **Pass** (Green Check) means the product's ingredient list contains no chemicals on the list; **Fail** (Red X) means the product's ingredient list contains one or more chemicals on the list.

Free of Meijer Extended RSL Chemicals

This field informs you whether a product's formulation passed WERCSmart screening for ingredients on Meijer's Extended Restricted Substances List.[3] **Pass** (Green Check) means the product's ingredient list contains no chemicals on the list; **Fail** (Red X) means the product's ingredient list contains one or more chemicals on the list.

Publicly Disclosed Generic Ingredient /High Priority Chemical/Extended RSL Chemical

These fields report the name(s) of the ingredients responsible for a screening alert or failure, provided the offending ingredient is marked as "publicly disclosed" in WERCSmart.

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[2] https://www.ulpurview.com/PurviewUI/Catalogs/856/Ingredients/ratings/1
[3] https://www.ulpurview.com/PurviewUI/Catalogs/853/Ingredients/ratings/1

3.   DISCLOSURE OF INGREDIENT IDENTITY

If you have consented to Tier 2.2, UL is authorized to share the publicly disclosed ingredients in a product's formulation with Meijer. Note that only ingredients you have marked as "publicly disclosed" on WERCSmart are shared – *trade secrets or ingredients marked as "not publicly disclosed" are not provided to Meijer. If your product contains a third-party component, the identity of constituents in that component are not provided to Meijer, irrespective of whether the third-party supplier has marked them as "publicly disclosed."* In addition, *absolutely no percent formulation data are shared with Meijer*.

Meijer accesses a product's publicly disclosed ingredients via the Ingredients popup on the Ratings tab of PurView. The popups display each ingredient's name and indicates whether that ingredient is on chemical lists that Meijer uses to screen products. Suppliers also have access to their product ingredient lists on PurView, in order to review how their products look when they are shared with Meijer.

The screenshot below illustrates an example public ingredient list for an anonymized product:

Name	CAS Number	Is Generic	Meijer High Priority Chemicals	Meijer Extended RSL
Ethyl Alcohol	64-17-5	—	—	—
Fragrance		❓	❓	❓	❓
Sodium Laureth Sulfate	9004-82-4, 1335-72-4, 13150-00-0	—	❌	—
FD&C Red 40	25956-17-6	—	—	—
Sunflower oil	8001-21-6	—	—	—
D-Glucose, ether with glycerol	100402-60-6	—	—	—
Water	7732-18-5	—	—	—
Cocamidopropyl betaine	61789-40-0, 83138-08-3	—	—	❌

In this example, there are 8 publicly disclosed ingredients in a product. One ingredient is on Meijer's High Priority Chemical list and another is on Meijer's Extended RSL List. The formulation also includes an unscreenable generic. In the event that a product contains a generic ingredient name (e.g., "fragrance") that lacks the chemical identity information needed for screening, the system flags it with a question mark because it cannot determine if constituents of that generic ingredient are on various screening lists.

If a product's full WERCSmart formulation includes an ingredient that is not marked as publicly disclosed,

Meijer receives the placeholder name "Undisclosed Ingredient" to protect the confidentiality of that ingredient, as illustrated below:

Name	CAS Number	Is Generic	Meijer High Priority Chemicals	Meijer Extended RSL
Water	7732-18-5	—	—	—
Glycerin	56-81-5, 8013-25-0, 30918-77-5	—	—	—
Fragrance		?	?	?	?
isocetyl stearoyl stearate	97338-28-8	—	—	—
Undisclosed Ingredient 1		?	?	?	?
Undisclosed Ingredient 2		?	?	?	?
Undisclosed Ingredient 3		?	?	?	?
Undisclosed Ingredient 4		?	?	?	?
Undisclosed Ingredient 5		?	?	?	?
Undisclosed Ingredient 6		?	?	?	?
Undisclosed Ingredient 7		?	?	?	?

In this example, there are three publicly disclosed ingredients and seven undisclosed ingredients. Meijer is not provided with the identity of undisclosed ingredients on PurView, but these ingredients are screened against Meijer's various chemical lists on WERCSmart and those screening results impact a product's brand evaluation.

Note that incorrectly marking an ingredient as not publicly disclosed in WERCSmart not only hides its identity from Meijer but also from your company administrators in PurView. If that ingredient is on a Meijer chemical screening list and is responsible for a screening failure, PurView will only display that the product fails the screen, but it will not reveal the identity of the offending ingredient to Meijer or to you. This will then generate additional work for you to identify the ingredient causing your products to fail an evaluation. **If an ingredient is listed on your product label or SDS, it should always be marked as publicly disclosed to avoid this problem**.

V. HOW TO RESOLVE ISSUES WITH YOUR PRODUCT RESULTS

> **1.   ACTIONS NEEDED TO ADDRESS BRAND EVALUATION FAILURES**

This section highlights the reasons that would prevent items from passing Meijer's brand evaluation and the actions required to get items into a passing status.

A product may not pass its brand evaluation because of one or more of the following reasons:
1. it (and/or any consented third-party components) contains a chemical on Meijer's chemical screening lists
   - In this case, the product or relevant third-party component will need to be reformulated to remove the offending ingredient, or a de minimis override may be requested if the offending ingredient constitutes less than 0.01% (100 ppm) of the finished formulation (see instructions below in Section 2).
2. it (and/or any consented third-party components) contains a generic ingredient which cannot be fully screened, or it contains an unconsented third-party component
   - In this case, the WERCSmart formulation for the product or relevant third-party component will need to be updated to remove any generic ingredient (see instructions below in Section 3) or the third-party component will need to be updated to include consent for screening.

The following sections provide instructions about how to address issues related to Meijer's full formulation screening and ingredient disclosure requirements.

> **2.   REQUESTING A DE MINIMIS OVERRIDE OF A SCREENING FAILURE**

If your product fails to pass Meijer's brand evaluation because UL screening has detected a Meijer High Priority or Extended RSL Chemical in your primary formulation or a consented third-party component, you may qualify for a de minimis override of the screening failure if the offending ingredient constitutes less than 0.01% of the finished formulation (i.e., is present at less than 100 ppm).

- To apply for an override of a screening failure due to an ingredient in your primary formulation, please click on the Contact Us link in the footer of any PurView page, select Other Questions and provide the WPSID of your product in the Comments area. . In subsequent communications you will be asked to provide a screenshot of that formulation's WERCSmart ingredient table that shows the offending ingredient's concentration is less than 0.01%.
- To apply for an override of a screening failure due to an ingredient in a third-party component, please click on the Contact Us link in the footer of any PurView page, select Other Questions and provide the WPSID of your product and the WPSID of the relevant component in the Comments area. In subsequent communications you will be asked to provide an affirmation from your component supplier that the offending ingredient's concentration is less than 0.01% in your finished formulation. You will need to provide your supplier with the % concentration of their component in your formulation, which they will then need to combine with their information about the % concentration of the offending ingredient in their component in order to calculate its % concentration in your finished

product.[4]

3. REPLACING GENERIC INGREDIENT NAMES WITH CONSTITUENT DISCLOSURE

<u>The most common reason products fail to pass Meijer brand evaluations is because their formulations contain unscreenable generic ingredient names</u>, such as "fragrance" or "flavor." Because generic names contain no information about their specific constituents, they cannot be screened for our chemicals list. Vendors need to ensure that a product's WERCSmart formulation record includes **all** intentionally added ingredients, which includes not only the ingredients in their primary formulation, but also the constituents of intentionally added fragrance or flavor components.

Meijer expects its vendors to make progress on reducing their use of generic ingredient names using either of the following methods[5]:

1.   Ask Your Third-Party Supplier to Register its Component on WS (Preferred Method[6])

In most cases, vendors use generic ingredient terms to describe third-party components in their formulations. Vendors may not know the specific constituents in such third-party components or may know that information but lack the authorization to disclose such constituents. Meijer encourages its vendors to require their fragrance houses or other third-party component suppliers to register these components on WERCSmart. (There is no charge for registering third-party components). Once a component is registered on WERCSmart and the third-party supplier has provided Tier 2 Data Use consent, its constituents can be included in UL assessments while retaining their status as confidential business information.[7]

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[4] End product manufacturers can use the following template table to provide the information required for an override:

WS END PRODUCT NAME	WPSID	3RD-PARTY COMPONENT NAME	WPSID	% COMPONENT IN END PRODUCT	MEIJER PRIORITY CHEM(S) (% IN COMPONENT)	PRIORITY CHEM(S) (% IN END PRODUCT)
					List each Priority Chemical + % separately	List each Priority Chemical + % separately

[5] NOTE: These methods involve changes to your WERCSmart formulation, which will trigger a re-assessment by UL to generate up-to-date regulatory guidance for retailers selling your product. Adding fragrance constituents at very low concentrations rarely alters the regulatory classifications assigned to your products. Be advised that certain actions (adding UPCs to a formulation, forwarding products to a new retailer) cannot be conducted until the re-assessment is complete.   The typical turn-around time for a re-assessment is 48 hours or less from the time a revised formulation is submitted.

[6] This method has the following advantages:
- it ensures that assessments are based on full formulation datasets for a product's primary formulation as well as any embedded components,
- it ensures that the ingredient list of a component can be maintained and updated by the third-party supplier, and
- it makes it easy to manage multiple finished products that all utilize a common third-party component.

[7] In some cases your third-party component supplier may have already registered the components you use, but not provided the consent UL requires to be able to screen these components. To update the Tier 2 consent status of an existing component, instruct your supplier to contact the WERCSmart Help Desk and request that the relevant WPSIDs be placed into recertification. The supplier should use the action option for that WPSID and select "update," make their modifications and then resubmit. The revised consents will be used to re-run any consent-sensitive rules that were previously run on products that contain your component.

Neither the vendor using a third-party component nor Meijer will have access to the third-party component ingredient list. The only information that will be shared with the vendor and Meijer will be whether the component passes or fails the applicable screen.

To implement this approach, vendors should communicate with their third-party suppliers and request that they register the relevant component on WERCSmart and provide Tier 2 consent for it to be included in UL chemical screening. Once a component has been registered, the vendor should update their finished product WERCSmart formulation record, deleting the generic ingredient name and replacing it with the third-party component name or WERCSmart identifier.

Instructions about this process that can be shared with third-party suppliers are provided in the Section VI.

Note: this disclosure method allows your third-party supplier to retain complete control over the identity of ingredients in its component. If one of those ingredients is on a Meijer screening list, information that the component failed the screen will be provided to you and Meijer, but the identity of the offending ingredient will not be shared with you or Meijer. You will need to have separate conversations with your component supplier to identify the offending ingredient that will need to be removed from their component if you want your finished product to pass Meijer's evaluation, or if you want to request a de minimis override of the screening failure.

2.   Add the Constituents of Your Generic Ingredient to Your WS Formulation (Acceptable Method)

If the supplier of your fragrance or flavor component is unwilling to register its formulation as a third-party component on WERCSmart, you can obtain a list of all the constituents in their component and add them to your finished product formulation.   Each formulation that currently includes a generic ingredient like "fragrance" should be updated to remove the generic ingredient name and replace that with a listing of all of the constituents in your fragrance or flavor component. Vendors may need to obtain permission from their third-party component supplier (e.g., a fragrance house) to list constituents of their component in a product's primary formulation on WERCSmart.   **Note that you need to be sure that your third-party component supplier has provided you with a complete list of ingredients in its component**. In some cases, suppliers may only provide a list of ingredients that are required to be disclosed due to their allergenicity, not their full ingredient list. In other cases, suppliers may only provide a Safety Data Sheet for their component, which often does not include a full list of the constituents in their component. If your source provides a range for each ingredient's concentration, sum up the maximum percentage of each range to ensure the disclosed ingredient concentrations are close to 100%. Certificates of analysis provided by your third-party supplier are another potential source for a complete ingredient list for a component.

Vendors may also use a variation of this method in which they take the complete ingredient list they acquire from their component supplier and use it to register a "third-party" component themselves. This simplifies the management of multiple finished products that all share a common fragrance or flavor component. However, it generally requires a supplier to enter fictional % concentration data into their component registration, as third-party suppliers rarely share that level of formulation data with their customers.

3.   ENSURING THE DISCLOSURE STATUS OF YOUR INGREDIENTS IS CORRECTLY SET

Meijer (and other retailers) have high expectations regarding ingredient disclosure. Meijer is committed to providing chemical transparency of the products we sell and seeks to drive product innovation for a better tomorrow. To achieve this goal, all intentionally added ingredients should be marked as publicly disclosed in WERCSmart and should resolve to a specific chemical identity. In many cases, vendors have not correctly set the public disclosure status of a product's ingredients in WERCSmart. **If you disclose an ingredient on an SDS, product label, or online – that ingredient should be in WERCSmart and should be marked as "publicly disclosed."**

Records that fall short of Meijer's transparency expectations are easily identifiable on PurView because their ingredient list shows multiple undisclosed ingredients (as illustrated on page #13 above). To quickly identify any of your products that have this problem, use PurView's Filter functionality and select PurView Undisclosed Ingredient Count. The number of undisclosed ingredients in your product records should generally be quite low (<2), because this status should be reserved for ingredients that are trade secrets. To meet Meijer's expectations, a product should have ZERO undisclosed ingredients.

Correcting the disclosure status of ingredients in your products must be done in WERCSmart. Go to the WERCSmart formulation page for any product with this problem and follow the instructions provided in Section III-1 above.

VI. INSTRUCTIONS FOR THIRD-PARTY COMPONENT SUPPLIERS

A. OBTAIN A SUPPLIER ACCOUNT ON UL'S WERCSmart

If you do not already have a WERCSmart account, go to https://www.ulwercsmart.com/ to begin the account creation process. Third-party suppliers are not currently required to purchase WERCSmart subscriptions to register third-party components. Finished product suppliers are also able to create "third-party" components following the instructions below.

B. REGISTER ONE OR MORE THIRD-PARTY FORMULAS

Once the user has accessed WERCSmart, from the Home Page options, select the "Register New Product" option:
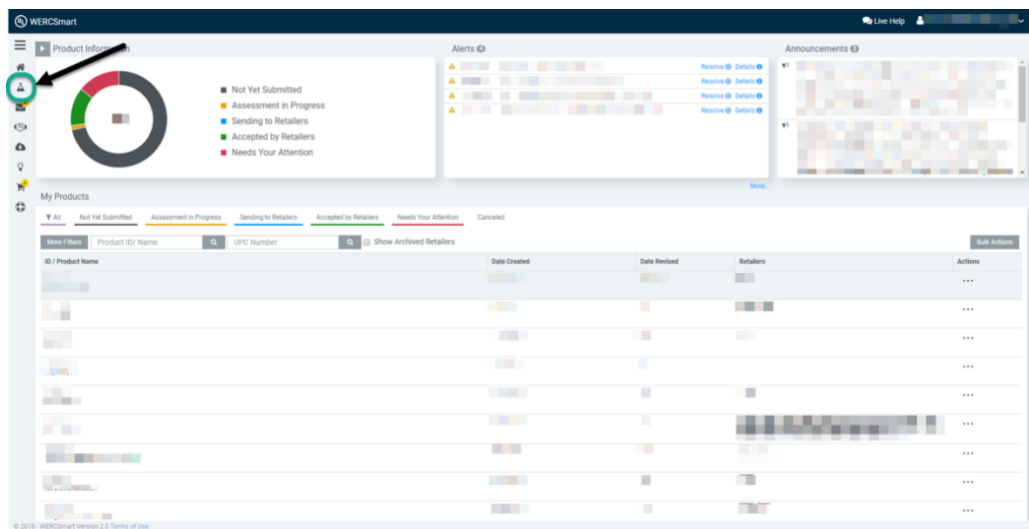
After providing a name for your component as the product name, select "Mixture, Blend, Formula, Polymer or Solution from Third (3rd, 3d) Party" as the type of product:

C. CREATE YOUR THIRD-PARTY FORMULA RECORD

On the Product Formulation page enter the ingredient list and formulation data for your component.

- If you are creating a component for a specific fragrance or flavor, provide the percent concentration of each constituent, ensuring that the total for all constituents sums to at least 100%. It is not possible to enter percent ranges. Meijer expects all intentionally added ingredients present at <u>0.01% or greater in a final product formulation to be listed in the component formulation.</u>

For each ingredient that you add to a formula, you will be asked to indicate whether it is publicly disclosed and, if so, what public name is used to identify that ingredient. Any ingredient that is disclosed to the public on your component's label, website or SDS should be marked as "publicly disclosed." The default disclosure status for an ingredient in WERCSmart is set to not publicly disclosed, so you need to affirmatively select "Yes" for each publicly disclosed ingredient. The public disclosure status of an ingredient controls whether its identity is ever provided to your customer or your customer's retailers. Note: UL has not currently implemented sharing the publicly disclosed ingredients in a component with either your customer or retailers. The only current use of disclosure status is when WERCSmart calculates a finished product's numerical Transparency Score.

D. PROVIDE CONSENT FOR YOUR COMPONENT TO BE INCLUDED IN PRODUCT ASSESSMENTS RUN BY MEIJER

After you enter your third-party formula, you will be asked to confirm that your formulation data are accurate and to grant consent to Tier 2 and 4 Data Uses:

- Tier 2.1 consent is required to allow UL to include your component in the chemical screening that Meijer performs on your customer's end-products.
- Tier 2.2 consent is required to authorize UL to share the identity of any ingredients you have marked as publicly disclosed with your customer or a retailer. Ingredients in your component that are **not** marked as publicly disclosed will not be shared with your customer, a retailer, or the public, unless such disclosure is required by an applicable law or regulation (e.g., CA Cleaning Product Right-to-Know Act). <u>Note: UL has not currently implemented sharing the publicly disclosed ingredients in a component with either your customer or retailers</u>.
- Tier 4.2 consent authorizes your customer or a retailer to further disclose any ingredients marked as publicly disclosed to consumers. Note: this consent is not currently being utilized because UL does not currently share publicly disclosed ingredients in a component with either your customer or retailers.

This consent applies only to this specific registration, or formula, and is not a "blanket consent" for your entire portfolio of component registrations in WERCSmart. For full details about Data Use consents, see the Data Use Tier Disclosure section of the [WERCSmart Terms of Use](#).
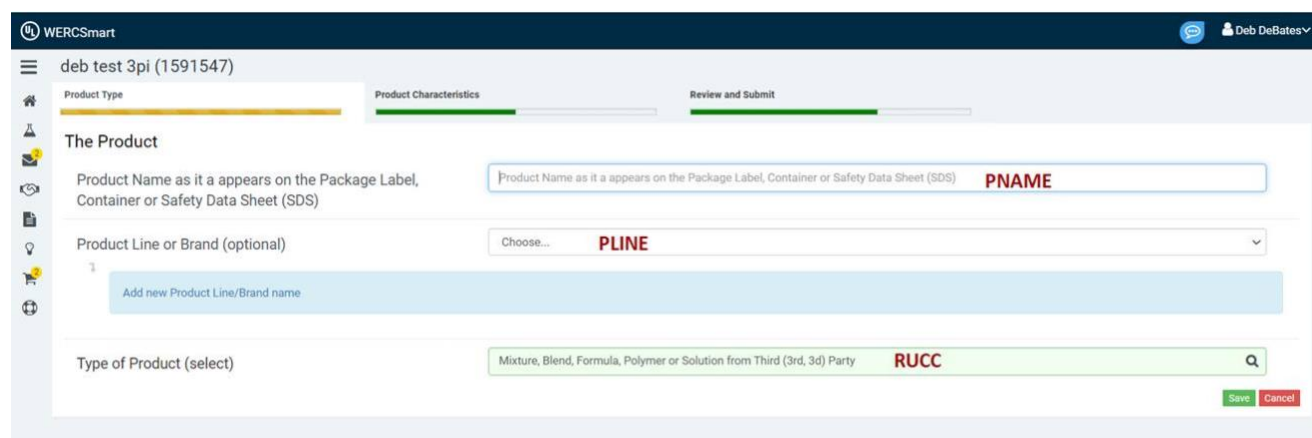

If you do decline to grant consent, your customer's end-product will not pass Meijer's brand evaluation, which requires that a product's complete formulation be screenable.

If you grant consent, UL will include your component when it generates aggregate usage reports, chemical screening reports and transparency ratios for your customer's end products.

To protect the confidentiality of your formulation data, all of these reports are generated in a way that will not disclose the specific ingredients in a third-party component. <u>If an ingredient in your component is on Meijer's screening list (whether or not it is marked as "publicly disclosed"), your customer and Meijer are only informed the component did not pass the screen.</u> By default, they are not provided with the identity of the problematic ingredient. If all or most of the ingredients in your third-party component are marked as not publicly disclosed, this will not impact your customer's ability to pass Meijer's brand evaluation.

E. PROVIDE NAMES FOR YOUR THIRD-PARTY COMPONENT

By default, the name of your component will be the "[Product Name of this Registration]." UL recommends that you assign Product Name based on what appears on the product's label or Safety Data Sheet.

You can also assign different names to your component for use in different contexts:

- You can provide a Formula Name, which will be used as the name for your component in the WERCSmart Ingredient Directory.

- You can provide up to three Public Names, which will be available to your customers for use if you have marked an ingredient in your component as "publicly disclosed." This is useful if you want to control the name a customer uses on their public labels to refer to your component, if you have indicated your component is publicly disclosed. A typical use case would involve setting the synonym to the INCI ingredient name "Fragrance."

- You should provide a "Business to Consumer Name" if your component may be used in cleaning product formulations. In this case, you can specify the generic name to be used on cleaning product ingredient disclosures that UL can generate for your customers.

F. SHARE THE IDENTITY OF YOUR REGISTERED COMPONENT WITH YOUR CUSTOMER SO THEY CAN ADD IT TO THEIR PRODUCT'S FORMULATION RECORD

During the registration process, you will be given three options to control whether and how your component is made known to your customers:

1. Restrict – Customers need to contact your organization for an access code in order to add the component to an end-product formulation.   UL does not include the name of your component in the WERCSmart ingredient catalog that is viewable by all end-product manufacturers. This allows you to control which of your customers are able to include a screenable component in their end-product.

2. Do Not Restrict – You authorize UL to include the name of your component in the WERCSmart ingredient catalog that is viewable by all end-product manufacturers.   Customers can add this component to a product if they know its name.

3. Exclusive Use – Use of the component is restricted to your company only and it is not available for inclusion in other supplier's end-product formulations.

G. REVISING A 3rd Party COMPONENT AFTER REGISTRATION OR UPDATING CONSENT STATUS

You can modify the consent status of an existing component registration (to grant/decline requested consents). To make such changes to an existing component record, contact the WERCSmart Help Desk and request that the relevant WPSIDs be placed into recertification, then use the action option and select "update." Make your modifications and resubmit. Once the product clears UL Assessment, the revised consents will be used to re-run any consent-sensitive rules that were previously run on products that contain your component. Note that if you have components that were registered before 2019 and have not been updated since, you should revisit these components to respond to Data Use Tier consent requests.

If you need to modify the ingredients or percentages in an existing component registration, you must register a new component with its new formulation. You cannot make formulation changes to an existing component because its original data has already been used to generate regulatory guidance and safety documentation for one or more end-products.