

Product Labeling

Each item's Tech Spec will list all required labels as well as additional labeling specific to your product. The Tech Spec will also communicate the proper placement of each label type as well as the nominated supplier of the label. All wording on a label must be visible after sewing into the product.

REQUIRED LABELS

The United States Federal Trade Commission (FTC) and Customs Service Regulations require correct labeling of products. It is imperative that each item is correctly labeled with regard to:

- Eddie Bauer Trademark Label
- Country of Origin and Garment Size Label or where specified Combined Label (Country of Origin, Fiber Content and Garment Size)
- Care and Fiber Content Label
- Vendor Identification Label

Some products may require additional labels such as the following:

- Stuffed Articles Labels: Required in USA, for specific products, and Québec, Canada for all stuffed insulated products.
- Novelty Labels: Labels that call out special features such as fit or fabric attributes.

APPROVED LABEL SUPPLIERS & SOURCING

All Eddie Bauer Main Labels, Trademark (™), Care, Content, Country of Origin, Size, Specialty or Novelty labels are to be sourced from pre-approved label suppliers. Please see Tech Spec for nominated label supplier by item.

EDDIE BAUER TRADEMARK LABELS

These labels will be assigned in each Tech Spec. They may be in the form of a woven label, heat-transfer label, embroidery or screen-print label. They must only be sourced from Eddie Bauer approved suppliers as shown in the Tech Spec.

COUNTRY OF ORIGIN AND GARMENT SIZE LABEL

The Country of Origin and Garment Size Label is also known as the COO/Size label because it contains Country of Origin and the garment Size.

- Country of Origin
The combined label must state the country of origin. For example, "Made in China" or "Made in U.S.A."

If a product is packaged for retail sale and the country of origin is not clearly visible, the outside of the package must also be marked with the country of origin.

The FTC requires that if a garment has a neckline, the label containing the Country of Origin (COO) must be attached in the center of the neck midway between the shoulder seams or next to the brand label in the neckline (or to the right of any buttons or zippers in the back seam as you wear the garment). The COO must appear on the front of the label. For garments without a neckline, the COO must appear in a conspicuous location on the garment. For reversible garments with a neck, the COO must still appear in the center back of the neck, but may be a hangtag, tear away label, or heat transfer label.

- Garment Size
The garment size should be taken directly from the purchase order.
- WPL and CA #
The U.S. and Canadian government registration numbers be listed on the Care and Content label as: Eddie Bauer's registration numbers are as follows, WPL 9647 and CA 00665.

CARE AND FIBER CONTENT LABELS

The Eddie Bauer care instructions and fiber content information is combined into a single label, unless specified otherwise.

Care Instructions

The Federal Trade Commission (FTC) requires the following:

- Care labels are permanently attached and legible for the life of the garment.
- Care labels must be conspicuously placed and easily found by the consumer at point of sale.

Each garment has a specific set of care instructions that are called care codes and are assigned by the Eddie Bauer Quality Assurance Department. The correct care code number for the garment is found on the Standards tab in the Tech Spec. Examples of care code numbers would be 80L/09 or 85M/13. This is the code that needs to be given to the Eddie Bauer specified label supplier upon ordering. Every care code with translations in French-Canadian, Japanese, German, and Spanish, and can be found in the Care Labels Section of the Product Packaging and Packing Instructions Section within the Vendor Compliance Manual.

Fiber Content

The fiber content must be stated in generic terms pursuant to regulations of the U.S. Federal Trade Commission (FTC). Examples of generic fiber names are wool, cotton, and polyester. Use of trademarked names such as LYCRA® is not permissible unless specifically approved by Eddie Bauer. Review your item's Tech Spec for specific naming.

All fiber content must be stated in order of predominance. For example, 90% Cotton, 10% Silk or 80% Wool, 20% Nylon.

Fur/Faux Fur

As the use of faux fur continues to be a popular "novelty" trim, across many product areas within the company (i.e. **Outerwear, Accessories, Sportswear, Footwear**), it is important that we (Eddie Bauer) have a clear and consistent way to express fiber content labeling of these "novelty" fabrics as a company.

Several states including **New York, Massachusetts, Wisconsin, Delaware, and New Jersey** have adopted their own regulations that state if an item appears to be fur but is not, then the label should clearly state that it is "faux fur" and provide the actual material content.

The specific words "Faux Fur" must be used as a descriptor when describing the content of these novelty fabrics. ("Faux Fur" means artificially manufactured to resemble real fur but is not derived from animals). Location may also be included such as "Faux Fur Ruff", "Faux Fur Lining", for example. Full fiber content information needs to be stated on item fiber content labeling via sectional disclosure, based on confirmed fiber content testing results. (Sectional disclosure labeling must be used if a product has two or more sections that are composed of different contents. The fiber contents of the various sections are shown separately).

Real fur must be disclosed. The specific words "Real Fur" must be used as a descriptor on fiber content labeling via sectional disclosure. "Real Fur" means any animal skin or part thereof with hair, fleece, or fur fibers attached thereto either in its raw or processed state. "Real Fur" does not include such skins or parts thereof as are to be covered into

leather, which in processing will have the hair, fleece, or fur fiber completely removed; cowhide with hair attached thereto; or lambskin or sheepskin (shearling) with fleece attached thereto. <http://sfbos.org/sites/default/files/o0055-18.pdf>

For additional reference to US labeling requirements under the FTC, such as what is and is not covered, labeling requirements for fibers present in amounts of 5% or greater, fibers present in an amount of less than 5%, allowable fiber content tolerances and exception's to fiber content disclosure requirements (such as trimming and findings), please see the following link to "Threading Your Way Through the Labeling Requirements Under the Textile and Wool Acts."
<https://www.ftc.gov/tips-advice/business-center/guidance/threading-your-way-through-labeling-requirements-under-textile>

NOTE: It is the responsibility of the vendor to confirm that special processing, such as garment dyeing and chemical washes done to the garments, will not impair the legibility of the labels.

Down Content

Eddie Bauer down content shall be stated as % DOWN and % WATERFOWL FEATHERS.

If species is Goose Down, then "GOOSE" will be included in the content statement. If "DUCK" Down, then down will simply be stated as "DOWN".

For down blends, content will be stated as "% DOWN, % WATERFOWL FEATHER, % POLYESTER FIBERS", based on current 3rd party testing.

The new label formats PR 7000, (for down apparel, down sleeping bags, & down throws), & T12503 (for accessories), include the required added phrases:

- Note: This product contains an amount of feathers not exceeding that allowable by law
- Contains Non-Textile Parts Of Animal Origin

In addition, under the State of Utah, the sterilization permit number (PER. NO.) of the down supplier is required to be listed on the content (textile) label. For more information about Utah's sterilization permit number requirements for filled clothing please visit the State website <https://rules.utah.gov/publicat/code/r070/r070-101.htm>.

For more information on care and content label approvals see Section 8 "Testing" of the VCM within the QA Apparel Testing Policy (page 9) or Non-Apparel Testing Policies section (page 5); under "Care/Fiber Content Label Development Approval Process".

For any questions in this section, please contact your EBQA Engineer.

VENDOR IDENTIFICATION NUMBERS LABEL #15000 & #15000 Harsh Wash

These labels identify information such as Department #, Style #, Vendor #, DRN #, Season Code, and Down Lot #. All garments must have one of these Eddie Bauer item identification number labels sewn and stacked under the care label. It is intended to remain attached to the product and legible through customer handling and the early returns processing, however, it is not required to be permanent.

NOTE: The 15000 label is for standard wash while 15000_Harsh_Wash is for Harsh Wash only items such as denim and other bottoms as called out in the Tech Spec.

Special instructions for down insulated products: All down insulated products, such as jackets, comforters, and accessories, must have the Down Lot number (#) printed on the Vendor Identification Label (#15000).

Vendors have the option of printing in-factory or using their own supplier. In either case they must first submit a sample to the Eddie Bauer Product Development Department for approval and it must be prior to the labels being applied to the garments.

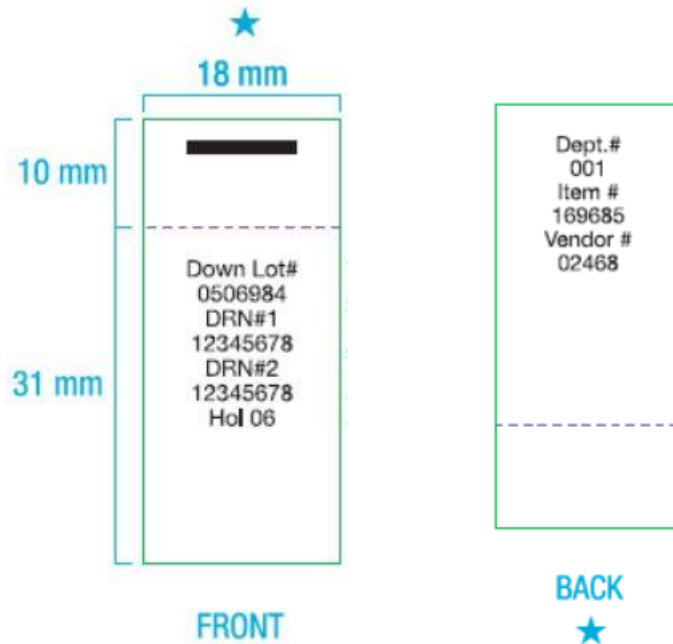
This label shall be made from a durable, white polyester coated fabric printed with black ink for all products except denim and bottoms. All denim and bottoms must utilize a woven polyester label specifically created for harsh washes.

Dimensions of this label should range between 18mm x 25mm to 18mm x 42mm with Helvetica Neue font size 6pts.

The following is the required format in order and in English. Note- the reference number must be the Eddie Bauer design reference number.

Down Lot #	(required only if you are manufacturing DOWN merchandise or apparel)
DRN #	(8-digit)
LKZ #	(required only for EB Germany orders)
EBG Item #	(required only for EB Germany orders)
Reference #	(8-digit) Optional
Season Code	(i.e. Spr 20, Sum 20, Fal 20, or Hol 20; if need to show 2 seasons use format Spr/Sum 20 or Fall/Hol 20)
Dept. #000	(3-digit)
Style #000000	(6 or 9-digit)
EBG PO #	(required only for EB Germany orders)
Vendor #00000	(5-digit)
EBG Season #	(2020-1 = Spring 2020, 2020-2 = Summer 2020, 2020-3 = Fall 2020, 2020-4 = Holiday 2020)

(Picture not actual size)



NOVELTY LABELING

Special features will sometimes be called out such as a fit name or performance attribute such as “wrinkle resistant”. These labels are used in addition to the main label and are detailed in the item’s Tech Spec. Label suppliers will be identified on the item’s Tech Spec.

STUFFED ARTICLES LABELS FOR INSULATED PRODUCTS

All insulated, stuffed, or upholstered products (any items with padding, filling or cushioning), require the Québec Stuffed Articles Label to conform to Québec statute on stuffing and upholstered and stuffed articles. Each manufacturer must register with Quebec, as soon as possible, (if you have not already done so). To obtain a manufacturer’s registration number and a current permit please follow the link below. Permits expire one year after the date of issue; permits must be renewed each year.

For additional standards information, applying for a manufacture’s permit, label specification, format, or size, visit:

<https://www.economie.gouv.qc.ca/en/outside-quebec/home/rembourrage/>

Or contact:

Direction des biens de consommation et du commerce électronique
380, Saint-Antoine Street West, 4th Floor
Montréal (Québec) H2Y 3X7
Phone: 514 499-2176 Fax: 514 864-9276

Label Format Used for Clothing and Miscellaneous Articles

EDDIE BAUER LABEL 1A:

Item Description

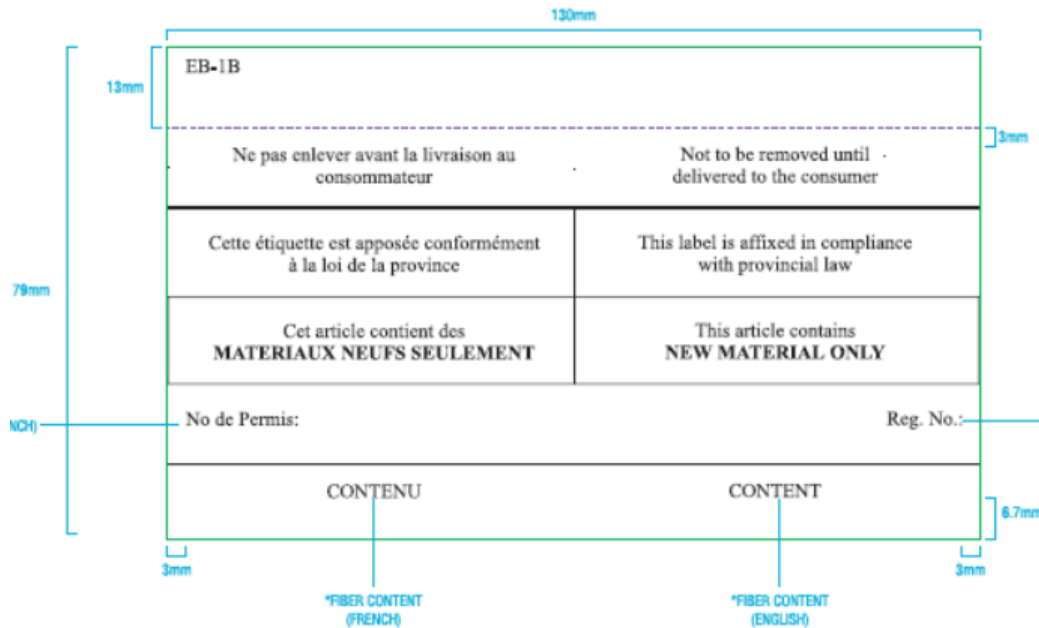
QUEBEC STUFFED ARTICLE Label Model 1A FURNITURE AND BEDDING



EDDIE BAUER LABEL 1B:

Item Description

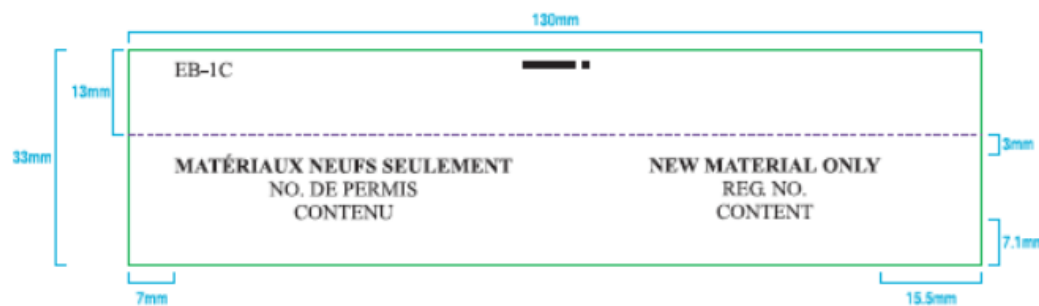
QUEBEC STUFFED ARTICLE Label Model 1B APPAREL/PACKS



EDDIE BAUER LABEL 1C:

Item Description

QUEBEC STUFFED ARTICLE Label Model 1C SMALL



PLEASE NOTE:

- Pictures are not actual size.
- Black lettering on white background
- Variable fields listed in this label include the following information:
 - Manufacturer Registration Number (Reg. No.);
 - The content of stuffing material(s) listed in order of predominance;

- Labels must be of muslin, imitation vellum or laminated thermoplastic fabric (except for use on clothing) that does not fray by wear or tear easily.
- In all cases, labels must be solidly attached in a place where they may be easily seen.
- Each manufacturer must have and list their company registration number where the label states “Made by/Reg. No.”.
- Labels for upholstered furniture must be solidly attached to the front of the frame so as to be easily seen when the cushions are removed or to the front of the bottom in such a manner as to hang down and be easily seen when the piece of furniture is in its normal position.
- Where the seat of a chair is manufactured and installed as a separate unit and where the underside is a hard surface, the label may be printed there in indelible black ink with a rubber stamp to be clearly legible.

U.S. UNIFORM LAW

Along with the requirements for Québec Stuffed Articles Label requirements, there is an equivalent requirement for the United States. Filled bedding, furniture, sleeping bags and toys sold in the USA require a special label- Uniform Law Label. These labels must meet specific requirements. 13 states and the City of Detroit require registration as part of the labeling process. Labels in most states require the display a Uniform Registry Number (URN). The URN identifies the manufacturing facility which produced the product. This can be any factory in the world whose products are sold in the U.S.

For additional information on label specification, format, size, font, etc. please visit- www.iabflo.org

METHODS OF AFFIXING

The Federal Trade Commission requires that all labels be easily seen or found by the consumer at the time of purchase and remain securely attached to the product through purchase by the consumer. Note the following when setting labels:

- Care labels must be permanently affixed and legible for the life of the product.
- If it is necessary to change the garment size on the label after it has been attached, the entire label must be removed and replaced with a new size label. Alteration of existing labels is not permitted.
- Sewn-in labels must be attached only with spun (i.e. soft) thread. The use of monofilament thread or any thread that might irritate or abrade the skin is not permitted.
- Sew down any label edges that are not heat-sealed or do not have a woven selvage; there must be no raw edges that might ravel when worn or cleaned by the customer.
- Factory must ensure all heat-sealed edges are smooth to the touch. Rough or coarse edges are not permitted.
- When setting labels to any part of a garment that has two layers of fabric, set the label to the inside layer first before joining the two fabrics.
- If notches or punch holes are used to help locate the labels, make sure that the notches or holes are fully covered by the label after it has been set.
- Vertical edges of labels must always be parallel to the center front of the garment and appear “square” to the eye of the inspector.
- Unless otherwise specified, topstitch thread must match the label ground color. Bobbin or looper thread must match the fabric on which the label is sewn.

PRODUCTS CONTAINED IN PACKAGES

If a product is sold in a unique display package and will remain in that package at the time of purchase, the country of origin and care labeling must be on the package or have a hangtag attached. The only exception is if the package is clear and the consumer can easily access the care instructions. Additionally, packaged merchandise must meet all requirements contained in the U.S. Fair Packaging and Labeling Act and the Canadian Consumer Packaging and Labeling Act.

ADDITIONAL REQUIREMENTS FOR SPECIFIC ACCESSORIES

All Retail, Outlet, and Direct products utilize the previous mentioned requirements and at times, an alternate method of sewing or embossing may be required. Reference the item's Tech Spec for specific label requirements and detailed photos.

- Belts: All labeling information may be embossed, or a sew-in label can be placed behind the belt buckle.
- Socks: Socks require either a paper "band" or "rider" to communicate all required labeling and a means to package the item. Country of origin must be printed on the front of the band.
- Gloves: All gloves shall have the fiber content, country of origin, WPL # and CA # on one glove in a pair. Care labeling is not required for gloves unless specified.
- Hats: All hats shall have the fiber content, country of origin, WPL # and CA #. A care label is not required unless specified.
- Scarves: Scarves shall have the same requirements as wearing apparel. The label must state fiber content, the country of origin, WPL # and CA #, and care instructions.
- Footwear: All label information (including French-Canadian translation) and samples of type or format must be approved by the Eddie Bauer Quality Assurance Department.
- All marking must be permanently printed or self embossed into the shoe interior. The use of gold foil is not permitted. Color must be confirmed with your Eddie Bauer designated representative.
- The following elements are required on ALL footwear: All information is to be bilingual (English and French-Canadian)
- Size: Must be permanently marked to the item along with Gender (ie: Men's Size 11)
 - Country of Origin: must be permanently marked.
 - Fabric / Material Content: of both upper and sole.
- Contact your Eddie Bauer designated representative for specific instruction for care for fabric shoes and slippers.
- Gadgets: Battery operated products
- All battery-operated products must include the below warning information along with proper signs as applicable.
1. Need to indicate size of battery and # of batteries.
 2. Products with replaceable batteries shall instruct user to replace batteries ensuring proper polarity, with correct battery type and as a simultaneous set.
 3. Battery warning- Do not mix old and new batteries.
 4. Whether batteries are included or not.
- FCC/Industry Canada (IC)
- Electronic products that require compliance with FCC/IC must have appropriate markings on the product/packaging. Electronic products that are exempt must have valid documents to support the claim. Review with EBQA-US for additional information.

ENVIRONMENTAL MARKETING CLAIMS

The vendors must comply with the “Guides for the use of Environmental Marketing Claims” as specified in 16 CFR 260. Environmental claims (i.e. recycled, ozone safe, etc.) must be supported by valid, on-file test data. The vendor is responsible for obtaining a copy of the CFR and applying the specifications to the product when necessary.

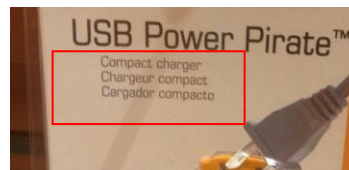
NON-APPAREL PRODUCTS CONTAINED IN PACKAGES

If a product is sold in a unique display package and will remain in that package at the time of purchase, the country of origin and care labeling must be on the package or have a hangtag attached. The only exception is if the package is clear and the consumer can easily access the care instructions. Additionally, packaged merchandise must meet all requirements contained in the U.S. Fair Packaging and Labeling Act and the Canadian Consumer Packaging and Labeling Act.

Below are some guidelines for packaging information.

Mandatory Fields

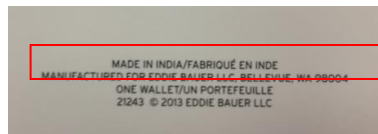
- Product identity – must be English and French-Canadian



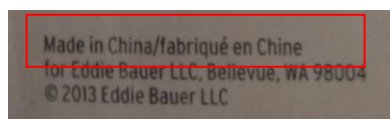
- Net quantity if applicable - must be English and French-Canadian



- Dealer name and principle place of business – only needs to be in English
 - Manufactured for Eddie Bauer LLC, Bellevue, WA 98004



- Country of Origin – only needs to be in English but preferable in French-Canadian also.



- Warnings – English and French-Canadian

