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DSW ADULT JEWELRY GUIDELINES

All jewelry must be tested for safety and must conform to existing U.S. laws, regulations and any additional DSW requirements. These guidelines contain minimum quality standards and expectations, but it does not contain comprehensive compliance requirements and should not be construed as law. DSW vendor partners are required to make all manufacturing facilities aware of this content and are responsible for sourcing and obtaining test reports for all components. In addition to reading, understanding and complying with the content contained in this guide, it is the responsibility of all DSW vendor partners to read, understand and comply with all laws and regulations that pertain to the industry. In certain instances, however, DSW standards may be higher than the legal minimums.

Laws and regulations pertaining to this industry include but are not limited to:

- [The Consumer Product Safety Improvement Act of 2008 \("CPSIA"\)](#)
- [California Proposition 65](#)
- [Federal Hazardous Substances Act \("FHSA"\)](#)
- [Illinois Lead Poisoning Prevention Act](#)
- [California Metal Containing Jewelry Law](#)
- [The Textile Fiber Products Identification Act](#)
- [Fair Packaging and Labeling Act – 16 CFR 500](#)
- [Country of Origin Marking – 19 CFR 134](#)
- [FTC's Guide for the Jewelry, Precious Metals, and Pewter Industries – 16 CFR 23](#)

In addition to the requirements contained in these guidelines, you agree to comply with all of the terms and conditions set forth in the PO and all documents incorporated by reference, including but not limited to the policy and procedures set forth in the Vendor Code of Conduct as well as the current version of Domestic Footwear & Accessories Logistics Guide; available at <http://dswinc.com/vendors.jsp>.



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Adult Jewelry Guidelines

A. Testing Compliance

a. Regulatory Review:

- i. All products should be reviewed and approved against the requirements of California Proposition 65 to determine if additional testing or labeling is required.
- ii. Must comply with all required acceptable ppm units for all testing properties:
 1. Lead
 2. Nickel-Free
 3. Cadmium
 4. Phthalates
- iii. Products must be labeled in compliance with:
 1. Country of Origin Marking Regulations – for imported items
 2. Fair Packaging and Labeling Act
 3. FTC's Guide for the Jewelry Industry
- iv. Vendors must ensure products are in compliance with CPSIA. Note that some products will require a General Conformity Certificate ("GCC") from the manufacturer under CPSIA. Vendors must keep copies of all GCCs.
- v. Flammability of products is not to exceed the maximum allowable limit, pursuant to FHSA, testing of solids under 16 CFR § 1500.44

b. Performance Review:

- i. Pull and/or drop tests where applicable on actual product
- ii. Perform drop test on components, beads, gemstones where applicable

c. Anti-Tarnish/Visual Finish Review:

- i. All components shall:
 - Have clean shiny polish (no pits, scratches, porosity, fire scale)
 - Not have fingerprints, dirt, polishing compound
 - Not have excess solder (if applicable)
 - Not be misshaped or fractured
 - Have all necessary hardware included
 - Have all welded edges be smooth and clean finished
 - Be free from any burrs, sharp edges, or any unsecured components or fasteners



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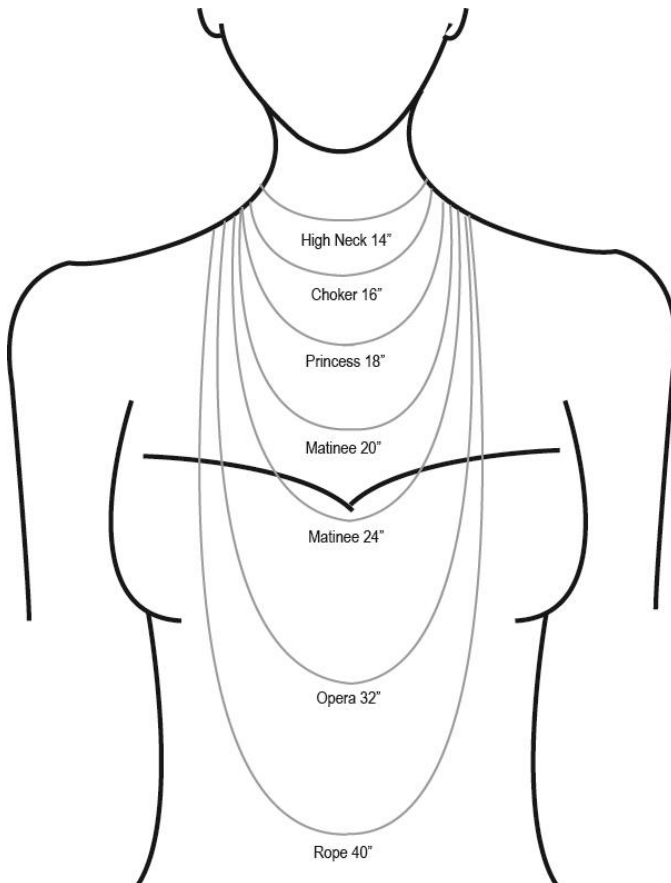
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B. Dimensional Tolerance

Product	Product	Tolerance
Bracelet	Rigid – Bangle	$\pm 1/8"$
	Rigid – Cuff Opening	$>1\frac{1}{4}" < 1/8"$
	Stretchable or Adjustable	$\pm 1/4"$ or 5 mm
Necklace	Short (<i>High neck-Princess</i>)	$\pm 1/4"$ or 5 mm
	Long (<i>Matinee-Rope</i>)	$\pm 1/2"$ or 13 mm
Earrings		Post not bent more than 10 degrees
Components		No more than 0.8-1.0mm

C. Measurement Specifications (Guidelines Only)

a. Necklaces



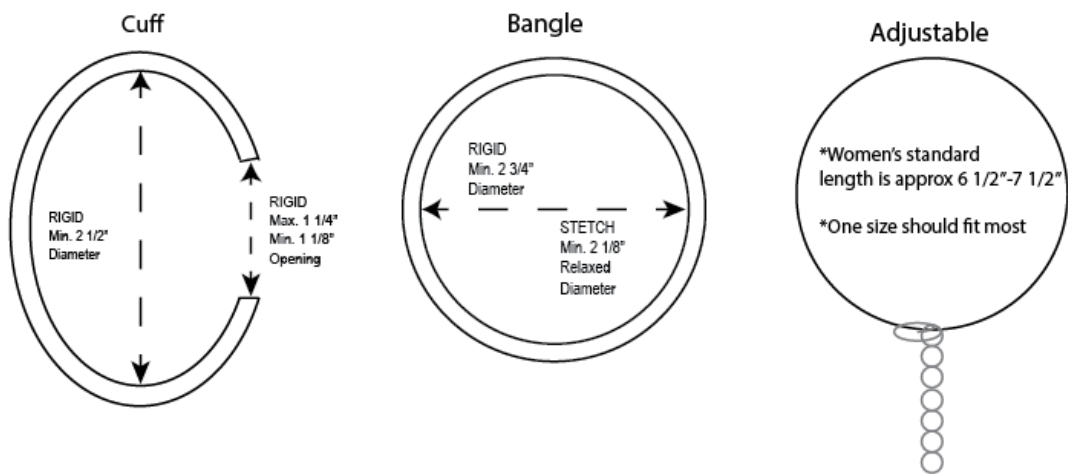
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a. Bracelets



D. Strength Requirement

For a product to pass the below tests, there shall be no signs breakage once the test is completed.

Test	Product	Strength
Pull	Thick Chain (> 2.5mm)	Withstand 5 lbs. of tension
	Thin Chain (< 2mm)	Withstand 3 lbs. of tension
Drop	Components, beads, gemstones	Withstand 36" (3 ft.) drop onto wood floor

**DSW reserves the right to request reports at any time from reputable testing lab.*

**Vendor/Factory should be able to produce passing reports within 24 hours*



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E. Required Guidelines for Components

Component	Photo	Requirement
Jumpring		<ul style="list-style-type: none"> • Should be soldered, secured, and closed completely • Needs to be aligned • Must use oval shape
Stones		<ul style="list-style-type: none"> • Must be properly set • If set in prong, prongs must be properly closed • No sharp edges or points
Earring		<ul style="list-style-type: none"> • Lever back spring closed and align with ear wire • Earring clutches are secure, but easy to remove • Post must be straight • Post must be soldered to earring
Finishing		<ul style="list-style-type: none"> • All plating must be applied evenly • All colors must be consistent throughout assortment • All components must have a Protective Finish of Lacquer Coating
Functional Closures		<ul style="list-style-type: none"> • If closure, it must be secured properly • Lobster claw & spring rings should open and snap closed • Spring Ring closures must not stick while opening and should open/close with ease

F. Identifying Defects

a. Critical Defect

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- Any defect or feature of the product that may pose a safety hazard to the customer or end user. Zero tolerance will be applied to the acceptable quantity of found critical defects.

Examples: Sharp points/edges, foreign objects, Broken or cracked piece exposing sharp edges, failure to pass all required safety and regulatory requirements

b. Major Defect

- A defect that is likely to result in failure, reduce the usability of the unit for its intended purposes, or make it unsaleable.

Examples: Functional defect components (broken or missing), unfavorable odor, tarnishing and rust defect, obvious workmanship defects

c. Minor Defect

- A defect that is NOT likely to reduce the usability of the unit for its intended purpose of the defect is a departure from established standards, but will have little bearing on the effective use of the units.

Examples: Workmanship defect which does not compromise overall look or functionality, minor tarnish and rust defects in obscure places

G. Damage Tolerance and Vendor Accountability

- Quarterly, Damage % of sales per style will be pulled for analysis.
- Those styles that have reached a 5% damage rate or higher, DSW will reserve the right to request the vendor for financial accountability on loss of goods. Reported data will be shared for transparency and validation for the claim.
- Outside of the quarterly review, should the buyer become aware of a style that is actively impairing sales due to quality concerns, an RTV will be enforced.



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Jewelry Approval Process Flow Chart

