TARGET VENDOR GUIDANCE
How to Use WERCSmart and PurView to Qualify for Target Clean

I. OVERVIEW – QUALIFYING PRODUCTS FOR TARGET CLEAN

In order to enjoy the marketing benefits of Target's Clean Icon program, suppliers must have their in-scope products evaluated against Target's qualification criteria.

Target Clean in-scope products:

- For the following in-scope **formulated** categories, please read through this entire document to understand the qualification process:
    - Beauty
    - Household Cleaning
    - Formulated Baby Care
    - Personal Care
    - Formulated Feminine Care
    - Pesticides
    - OTC Medicines
    - Vitamins & Supplements
- Please reach out to Target.Clean@target.com if you have questions about qualifying formulated products for Clean.

- For the following in-scope **non-formulated** categories, Target uses a different qualification process:
    - Baby Diapers
    - Car Seats
    - Non-formulated Feminine Care
    - Pet Food
- Please reach out to Target.clean@target.com for information about how to qualify non-formulated products for Clean.

This overview outlines the key aspects of Target's formulated Clean Icon 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 may prevent your product achieving the Clean Icon.

To qualify a formulated product for Target's Clean Icon program, the following criteria must be met in all product categories:

- Product (including any third-party component) passes Target chemical screening.[1]
- Product (including any third-party component) passes the generic ingredient screen.
- Additional criteria must be met to qualify for specific product categories, including, for example, affirmations that a product is "Cruelty Free," or is free of certain ingredient classes, or possesses required certifications. These additional category-specific requirements can be found in Section IV.2.

---

[1] In January 2023, Target began using its new Priority Chemical List for Clean product screening. Target also utilizes several additional category-specific Clean lists that are only applicable to deodorant products; oral care products; OTC, Pharmacy and Supplement products; or pesticide products.

The data needed to evaluate a product comes primarily from a product's WERCSmart formulation record, so a supplier needs to ensure that:

- Supplier has registered its formulations on WERCSmart and associated every UPC sold at Target with a formulation registered on WERCSmart.
- Supplier has granted Target consent to Data Use Tiers 2.1, 2.2 and 4.1.
- Product is in an in-scope product category. Note that the Target Clean Icon is only available for products within the following WERCSmart super-categories:
  - Health & Beauty
  - Cleaning Products
  - OTC (specified recommended uses)
  - Pharmacy (specified recommended uses)
  - Supplements (specified recommended uses)
  - Lawn & Garden (specified recommended uses for several types of pesticides)
  - Kits[2]
  - See Section VII for full details about specified in-scope recommended uses
- If the recommended use of your product is not in a current in-scope category, it will not be eligible for the Clean Icon, although it can still be awarded other Wellness Icons.
- The ingredient list for each formulation is up-to-date and complete. If this list includes generic ingredient names such as "fragrance" or "flavor," a product cannot qualify for Clean because its formulation could not be completely screened. See Section V.3 for instructions about how to replace generic ingredient names with full ingredient disclosure.

Supplemental data about whether a product is "cruelty-free" or has affirmations or certifications needed to qualify are collected on UL's PurView platform. NO other information about products can be created or edited on PurView – DO NOT create product records from scratch on PurView.

The PurView platform provides suppliers with access to the qualification results for their products. See Section IV for instructions about how to interpret your qualification results. See Section V for actions required to remedy the various reasons for failure to qualify. 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. If the reason involves missing affirmations, certifications or validations, you must provide additional data to PurView.

A product only gets transferred from WERCSmart to Purview for Target Clean qualification after it meets the following criteria:

- The product's WERCSmart formulation record has an assessment status = complete. Product status cannot be not yet submitted, assessment in progress, or needs your attention.
- The formulation is in an in-scope product category for Target's program.
- The relevant UPC is associated with Target and is marked as accepted by Target.

Note that once ALL of the above criteria are met, it can take 24-48 hours for the product to be automatically transferred from WERCSmart to PurView.

---

[2] Kits comprised of products in any of the above categories are in-scope. Nested kits are not eligible for the Clean Icon.

- If this time has elapsed and PurView is not showing a new or updated record for your product, please click on the Contact Us tab at https://www.ulpurview.com and provide:
  - The WPSID(s) and UPC(s) of the product at issue. Please do not provide only a Target DPCI.
  - In subsequent communications with the PurView support team, you will be asked to provide a screenshot of the My Product table in WERCSmart showing the status of the WPSID(s) and UPC(s) at issue.
- Do NOT attempt to create any missing records directly on PurView – all product and formulation information in PurView must be derived from a WERCSmart record.
- If you need assistance interpreting Target's qualification criteria, resolving a failure to qualify, or replacing generic ingredients with third-party components, please click on the Contact Us tab at https://www.ulpurview.com and send us your question via the Comments area.

The current Target Clean qualification status of a formulated product on PurView controls whether a product page on target.com displays the Clean icon. All other Wellness icons are assigned via a separate process:
- In order to qualify for Wellness Icons outside of Target Clean, upload all packaging flats to Label Insight (https://www.labelinsight.com/target_onboarding).
- Suppliers will need to provide LI with all final product flat artwork for all products in their portfolio.
- Visit the above link and register for a free account to get started.
- If you have other questions about the Wellness icon process, please contact Target.clean@target.com.

II. GRANT CONSENT TO TARGET TO USE YOUR WERCSMART DATA

Target requests that its vendors consent to Data Use Tiers **2.1, 2.2** and **4.1**. Once consent has been granted, we use this data to implement our Chemical Policy and to determine which products qualify for Target Clean.

1. Consent for **Tier 2.1** involves chemical screening and aggregate chemical usage reports. Target requires Tier 2.1 consent to
    - Screen for the presence of chemicals included in our 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. Target 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 Target receive *percent formulation* details of your products.

3. Consent for **Tier 4.1** authorizes the public disclosure of results from the Target Clean program assessments. Target will only publish information that highlights the positive attributes of products, such as our "Target Clean" icon for products that do not contain certain chemicals.

If you have any questions about why Target seeks your consent for specific data uses, or about the consequences of not participating in this program, please contact Target.Clean@target.com .

To grant these consents, go to your company's dashboard in WERCSmart and select Retail Partners. On this page, your WERCSmart manager will see Target's requests as well as requests from any other retailers operating similar programs where you are also a supplier:
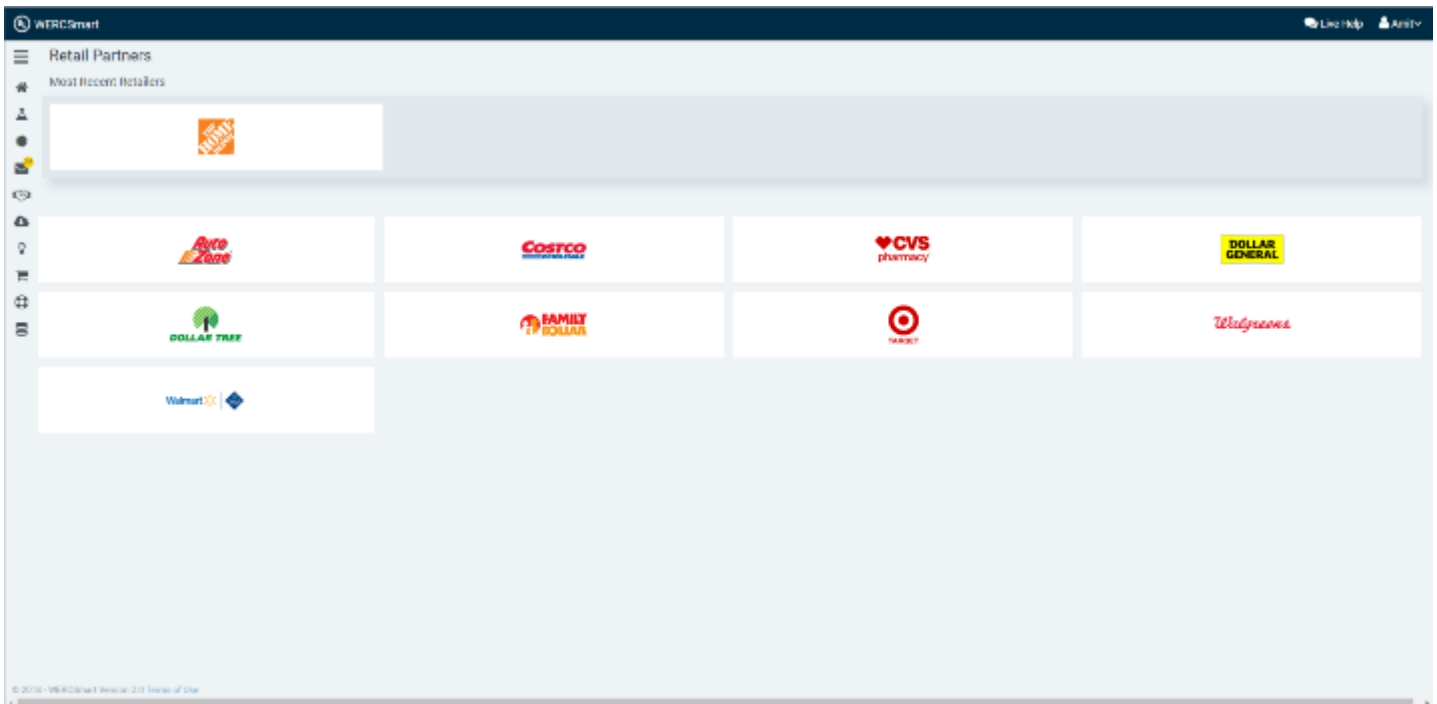
Select <u>Target</u> to review our specific requests:
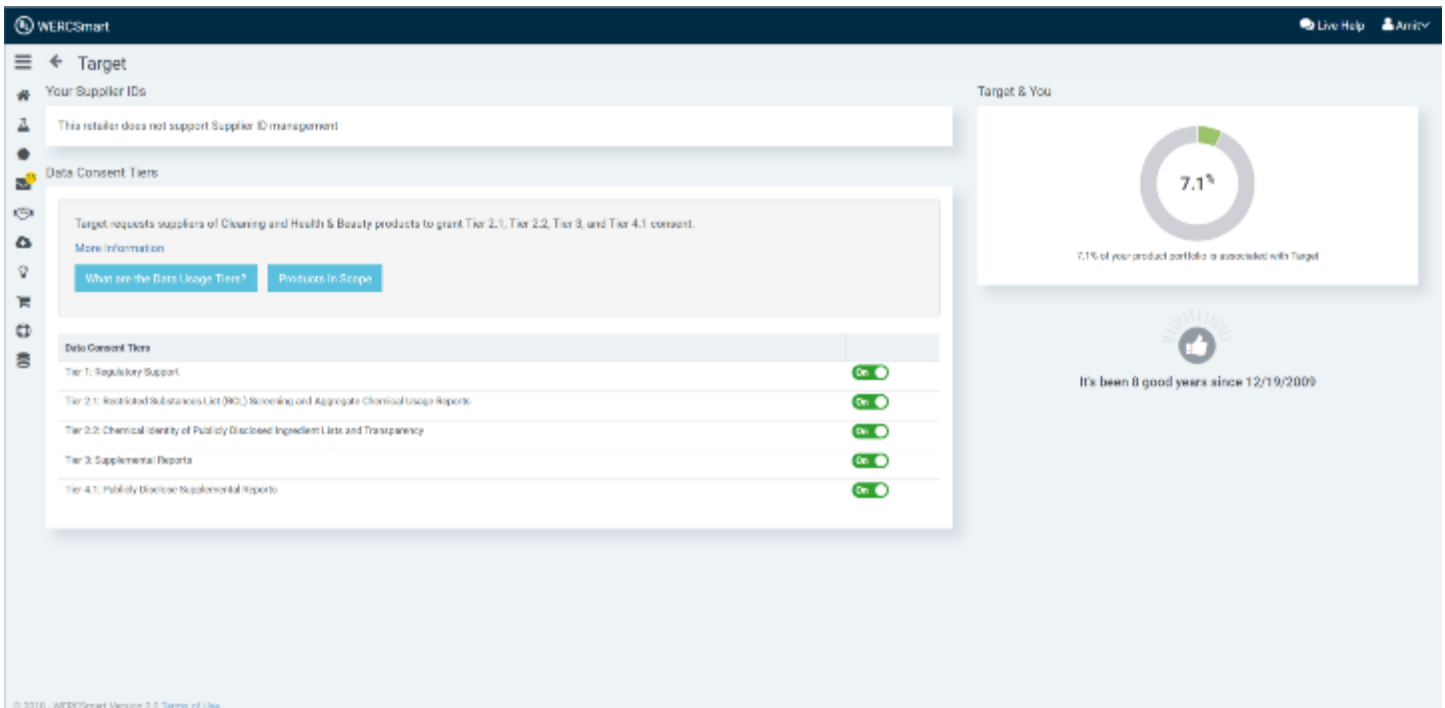
Note: Target requires Tier 2.1, Tier 2.2 and Tier 4.1. Target is not currently requesting Tier 3 consent.

III. CHECK YOUR WERCSMART AND PURVIEW DATA
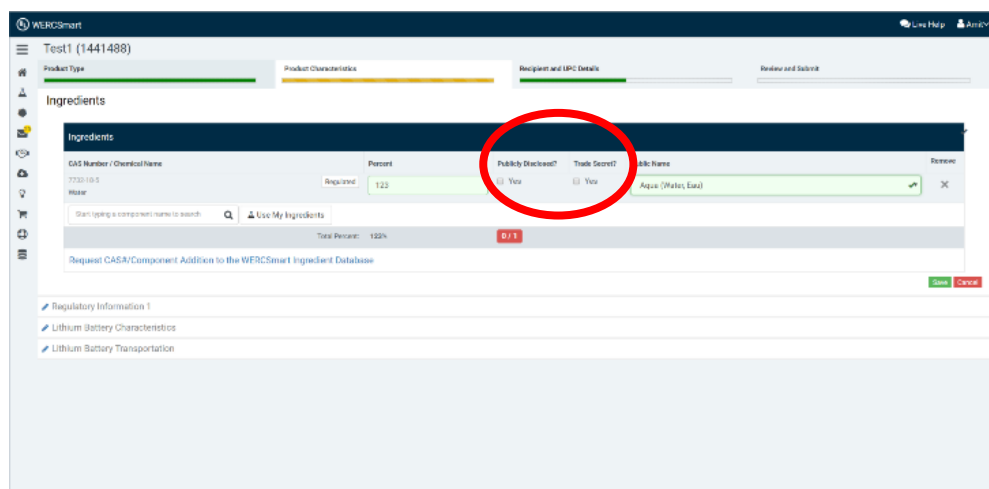
1.   WERCSMART DATA

Your WERCSmart formulation records provide critical data used in Target's assessments, 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.

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

1.   Every UPC sold at Target 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 Target relies upon for managing its assortments, specifically "Brand" and "DPCI."
5.   If your product is a Target private label 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 Target 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. Target also encourages suppliers to include non-intentionally added ingredients in their WERCSmart formulations, including contaminants and non-functional by-products.

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**. 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 not marked as publicly disclosed, its name and CAS# will not be disclosed to Target but it can still be screened by UL to determine if it is on a Target 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.
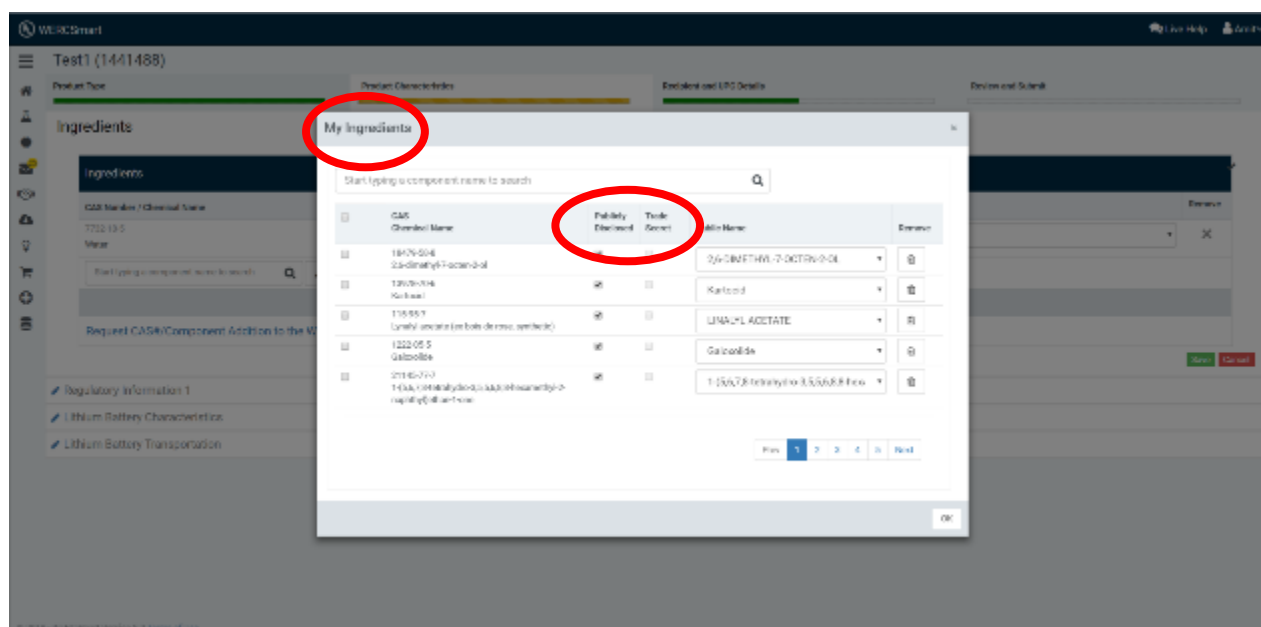
2. PURVIEW DATA

UL's PurView system allows you to review the results of Target's product evaluations and troubleshoot what additional action may be needed to qualify for Target Clean. Target provides its vendors with no-cost access to PurView so that they can view their product data as well as contribute additional data that is not collected on WERCSmart.

To be set up as a new user with access to PurView, please
1. Go to https://www.ulpurview.com/
2. Click the red 'Contact Us' button
3. Provide your name and email address and select Topic = New User Request for Retailer Chemical Policy. Select your WERCSmart Company name from the Company drop-down menu and Target as your desired Retailer Program.
   a. Note: If you are a third-party we will be in touch to ensure that you are authorized to access products on another supplier's behalf.
4. Once set up, you'll receive a system invite to your inbox. Typically, we'll get back to you within the same business day. Invitations expire in 48 hours for security purposes, so respond in a timely manner.

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

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 Target's chemical screening and Target Clean qualification
- *Regulatory Lists* displays the results of regulatory screens run against your product formulations
- *Sector Lists* displays the results of various sector screens
- *Transparency* displays the results of ingredient transparency assessments
- *Data* displays the raw product data obtained from you on WERCSmart or PurView

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

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

1. Every UPC sold at Target in in-scope product categories has a record in the PurView catalog. If a record exists for a UPC that has been archived on WERCSmart or is no longer in Target's active inventory, it should be deleted from PurView.
2. Data elements that Target requires (DPCI, 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.
3. Each item's affirmations (such as "Cruelty Free") have been accurately set. If they are missing or incorrect, edit these data fields on PurView.

Providing Required Affirmation and Certification Data:

Cruelty-Free:
Cruelty Free affirmations are required for Clean qualification in all product categories except Pesticides, OTC, Pharmacy and Supplements.   This information is not collected on WERCSmart, so it must be provided on PurView. Target recognizes that suppliers may take a variety of approaches when making "cruelty free" claims and expects that each supplier has validated the support for such a claim. Third-party certifications, on-pack 'cruelty free' or 'no animal testing' marketing claims, or company policies are all acceptable when making the associated affirmation in Purview.

To indicate whether a product is "Cruelty Free," select the edit pen to the left of a product name on PurView to open its Product Details page:

Review Target's Cruelty Free question:

Enter your response to the Cruelty Free question and then save your entry.

You can also select a set of product records by using the "Batch Edit" functionality on PurView to answer this question for multiple products.

Once you have batched your products and selected edit, click on the edit pen next to the Cruelty Free Validation field and enter the response you want applied to all the records in your batch.

The PurView Ratings tab will indicate for each of your products whether you have provided the validation and whether it qualifies for Target Clean:

Wellness Qualification	Reasons for Failure to Qualify	Cruelty Free Validation
✅	N/A	✅
❌	Cruelty Free validation absent	—

Other Affirmations:

Depending on your product's category, you may need to answer additional affirmation or certification questions to qualify it for Target Clean. Follow the same approach described above to provide additional required data related to:

‣ PESTICIDE AFFIRMATION

‣ OTC AND SUPPLEMENT AFFIRMATIONS

‣ SUPPLEMENT CERTIFICATIONS

IV. REVIEW RESULTS OF TARGET'S PRODUCT ASSESSMENTS

Target reviews the results of their screening program on PurView's Ratings tab. Target provides its vendors with no-cost access to PurView so that they can also view the assessments that Target receives. While Target sees results from all of its vendors, vendors only see results for their specific products.

1. CURRENT TARGET CLEAN QUALIFICATION

Target has established several lists of chemicals that are utilized by the Target Clean 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 Target. If one of your products contains an ingredient on a chemical screen, UL can share the chemical identity of that ingredient with Target **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 Target in order to protect the confidentiality of your formulations.

Examples illustrating the potential results of our screening program are presented below:

WS Recommended Use	Ingredients	Alert: Not Fully Screened on WS	Publicly Disclosed Generic Ingredient	Passes WS Screen for 2023 Target Priority	Publicly Disclosed Target Priority Chemical (2023)	Wellness Qualification	Reasons for Failure to Qualify 2023
Facial Care - Moisturizer and Treatment	26 Ingredients >	–	–	✅	–	✅	N/A
Deodorant - Non-aerosol	13 Ingredients >	–	–	❌	Benzyl Salicylate	❌	Contains Target Formulated Priority Chemical
Feminine Care - Moisturizer	18 Ingredients >	⚠️	Fragrance	✅	–	❌	Contains Unscreenable Generic
Shampoo, Dry (Aerosol)	8 Ingredients >	–	–	❌	–	❌	Contains Target Formulated Priority Chemical in 3rd Party Ingredient
Nasal Decongestant	7 Ingredients >	–	–	✅	–	❌	Product Affirmation absent
Herbal or Dietary Supplement	19 Ingredients >	–	–	✅	–	❌	Contains Target OTC & Supplement list Chemical
Other (Miscellaneous Kit Product)	Kit Ingredients >	–	–	❌	–	❌	Kit Child Contains Target Formulated Priority Chemical,Kit Child Cruelty...

You can see the possible results of Target'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 Target chemicals because it contains one or more generic ingredients or unconsented third-party components. The product will fail to qualify for Target Clean until full formulation details are provided via WERCSmart.

Passes WS Screen for 2023 Target Priority Chemicals

This field informs you whether a product's formulation passed WERCSmart screening for ingredients on Target's Priority Chemical 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 /Target Priority 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.

Wellness Qualification

The Wellness Qualification column informs you if your item does/does not qualify for the current Target Clean program.

1. **Pass** (Green Check) – Your product meets Target's Clean qualification requirements and expectations as follows:
    a) Product (including any third-party component) passes Target's chemical screen, using the Target Priority Chemical List.
    b) Product passes any applicable category-specific chemical screen
    c) Product (including any third-party component) passes the generic ingredient screen
    d) Supplier has granted Tier 4.1 consent to Target
    e) Supplier has confirmed in PurView that the item is "Cruelty Free" (if required for a category)
    f) Supplier has provided any required category-specific affirmations
    g) Product possesses any required category-specific certifications (applies to Supplement products only)

2. **Fail** (Red X) - Your product does not meet Target's Clean qualification requirements and expectations for one or more of the following reasons:
    a) Product contains one or more chemicals on Target's Priority Chemical List
    b) Product contains one or more category-specific prohibited chemicals
    c) Product contains one or more unscreenable generic ingredients
    d) Product contains one or more chemicals on Target's Priority Chemical List in a 3rd Party Ingredient
    e) Product contains one or more category-specific prohibited chemicals in a 3rd Party Ingredient
    f) Product contains an Unscreenable Generic in a 3rd Party Ingredient
    g) Product contains an Unconsented 3rd Party Ingredient
    h) Product lacks Tier 4.1 Consent
    i) Product lacks "Cruelty Free" or other category-specific affirmations
    j) Product lacks a required category-specific certification
    k) Product is a kit or is a child kit product, and one or more kit children fail Clean qualification
    l) Product is in an out-of-scope category for the Clean program

---

[3] https://corporate.target.com/_media/TargetCorp/csr/Formulated-Products_Target_Priority-Chemical-List-2021-Approach.xlsx

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

Results for other key components of Clean qualification are presented in the remaining columns of the Ratings tab:

Tier 4-1 Consent?	Cruelty Free Validation	Oral Care Product Passes Clean Label Screen?	Publicly Disclosed Clean Oral Care Ingredient	Deodorant Product Passes Clean Label	Passes WS Screen for Target OTC & Supplement	Publicly Disclosed OTC and Supplement	Passes WS Screen for Target Additional	Publicly Disclosed Supplement-Only	Products In Kit

2.   CATEGORY-SPECIFIC TARGET CLEAN REQUIREMENTS

For the following specific product categories, Target has additional or custom requirements for Clean qualification:

- Deodorants:
  - In addition to Target chemical and generic ingredient screening and "Cruelty-Free" validation, products in Target Department 49/Class 01 cannot contain any aluminum compounds.
- Oral Care:
  - In addition to the Target chemical and generic ingredient screening and "Cruelty-Free" validation, products in Target Department 49/Classes 08 and 09 cannot contain any artificial sweeteners.
- Pesticides:
  - In addition to the Target chemical and generic ingredient screening, products in a designated set of pesticide Recommended Uses (see Section VII) qualify for Clean only if they meet EPA requirements for allowable ingredients in a Minimum Risk Pesticide (as assessed on WERCSmart) and have a Minimum Risk Pesticide Label Affirmation (provided by the supplier on PurView). Clean qualification for pesticides does not require "Cruelty Free" validation.
- OTC and Pharmacy:
  - In addition to the Target chemical and generic ingredient screening, products in a designated set of OTC and Pharmacy Recommended Uses (see Section VII) qualify for Clean only if they meet the following requirements:
    - Product (including any third-party component) passes screen for OTC & Supplement Substance List
    - Supplier must provide affirmations that product does not contain artificial flavors,[4] artificial sweeteners, or synthetic colors
    - Supplier must provide affirmation that product meets all of the above requirements
    - Clean qualification for OTC and Pharmacy does not require "Cruelty Free" validation.

---

[4] The FDA definition of "artificial flavor" is provided in 21 CFR 501.22: "any substance, the function of which is to impart flavor, which is not derived from a spice, fruit or fruit juice, vegetable or vegetable juice, edible yeast, herb, bark, bud, root, leaf or similar plant material, meat, fish, poultry, eggs, dairy products, or fermentation products thereof."

- Supplements:
    - In addition to the Target chemical and generic ingredient screening, products in a designated set of Supplement Recommended Uses (see Section VII) qualify for Clean only if they meet the following requirements:
        - Product (including any third-party component) passes screen for OTC & Supplement Substance List and Additional Supplement-Only Substance List
        - Supplier must provide affirmations that product does not contain artificial flavors,[10] artificial sweeteners, or synthetic colors
        - Clean qualification for Supplements does not require "Cruelty Free" validation.
        - Product must be third-party certified by NSF[5] or USP[6] to be free from contaminants and adulterants
            - If product is a Sport Supplement, product must also be third-party certified as NSF Certified for Sport[7], BSCG (Banned Substances Control Group) Drug Free[8] or Informed Sport for Sport Supplements[9]
        - Supplier must provide affirmation that product meets all of the above requirements.

---

[5] The NSF Dietary Supplement Certification program requires i) a toxicology and label review to verify product formulation and marketing claims, ii) a formulation review to identify and quantify dietary ingredients declared on the product label, iii) contaminant testing to ensure that no unsafe levels of contaminants are present, and iv) a good manufacturing practices (GMP) facility inspection. NSF/ANSI Standard 173 is at https://www.nsf.org/testing/health/nutritional-supplements-personal-care-products/product-and-ingredient-certification.

[6] The USP (US Pharmacopeial Convention) Verified certification requires that i) the supplement has been produced in compliance with the FDA's cGMPs, ii) the ingredients on the label are in the bottle, and iii) the supplement contains no harmful contaminants. Details at http://www.usp.org/usp-verification-services/usp-verified-dietary-supplements.

[7] The NSF Certified for Sport (USADA Supplement 411): The NSF Certified for Sport® program builds on NSF/ANSI Standard 173 by also screening supplements for more than 165 banned substances and undeclared ingredients including stimulants, narcotics, steroids, diuretics, beta-2-agonists, masking agents and other substances, as well as harmful levels of specific contaminants. Details at https://www.nsfsport.com/our-mark.php.

[8] The BSCG (Banned Substances Control Group) Certified Drug Free tests for cGMP compliance, the absence of harmful contaminants, and the quality of ingredients on the label. In addition, it verifies that the supplement is free of substances banned in competitive sports and of prescription and over-the-counter drugs. List of certified products at http://www.bscg.org/certified-drug-free-database/.

[9] Informed Sport certification requirements include product and manufacturing facility audits, sample testing using LGC's ISO 17025 accredited prohibited substances supplement screen, and ongoing testing of every product batch. Details at https://sport.wetestyoutrust.com/about/certification-process

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 Target. 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 Target. If your product contains a third-party component, the identity of constituents in that component are not provided to Target, irrespective of whether the third-party supplier has marked them as "publicly disclosed."* In addition, *absolutely no percent formulation data are shared with Target*.

Target 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 Target 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 Target.

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

Name	CAS Number	Is Generic	Target 2023 Priority Chemicals
Polypropylene glycol, monobutyl ether	9003-13-8	—	—
Hydrogenated Castor Oil	61788-85-0, 8001-78-3	—	—
Stearyl Alcohol	112-92-5	—	—
Peg-12 distearate	9005-08-7	—	—
Zirconium, chloro glycine hydroxy aluminum complexes	90604-80-1	—	—
cyclopentasiloxane	541-02-6	—	—
Talc	14807-96-6	—	—
Water	7732-18-5	—	—
Fragrance		❓	❓
Butylated Hydroxytoluene	128-37-0	—	❌

In this example, there are 10 publicly disclosed ingredients in a product. One ingredient is on Target's Priority Chemical list. Another is 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, Target receives the placeholder name "Undisclosed Ingredient" to protect the confidentiality of that

ingredient, as illustrated below:

Name	CAS Number	Is Generic	Target 2023 Priority Chemicals
Sodium benzoate	532-32-1	—	—
Citric acid	77-92-9, 5949-29-1	—	—
Water	7732-18-5	—	—
Glycerin	56-81-5, 8013-25-0, 30918-77-5	—	—
Undisclosed Ingredient 1	❓	❓	❓
Undisclosed Ingredient 2	❓	❓	❓
Undisclosed Ingredient 3	❓	❓	❓
Undisclosed Ingredient 4	❓	❓	❓
Undisclosed Ingredient 5	❓	❓	❓

In this example, there are four publicly disclosed ingredients and five undisclosed ingredients. Target is not provided with the identity of undisclosed ingredients on PurView, but these ingredients are screened against Target's various chemical lists on WERCSmart and those screening results impact a product's Clean qualification.

Note that incorrectly marking an ingredient as not publicly disclosed in WERCSmart not only hides its identity from Target but also from your company administrators in PurView. If that ingredient is on a Target 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 Target or to you. This will then generate additional work for you to identify the ingredient causing your products to fail to qualify for Clean. **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 FAILURES TO QUALIFY FOR TARGET CLEAN

This section highlights the reasons that would prevent items from qualifying for Target Clean and the actions required to get items in qualifying status.

A product may not qualify for the Target Clean program because of one or more of the following reasons:
1. it (and/or any consented third-party components) contains a chemical on Target'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.
3. the supplier has not granted Target Tier 4.1 consent
   - In this case, access the Retail Partners section of your WERCSmart account and grant Target the missing consent.
4. the supplier has not confirmed the product is "Cruelty Free"
   - In this case, access the product's record on Purview and provide the "Cruelty Free" affirmation (see instructions on page 10)
5. the supplier has not provided other required affirmations or certifications for the product
   - In this case, access the product's record on Purview and provide the missing affirmation or certification
6. the product is a kit and one or more kit children fail to qualify for one or more of the above reasons
   - In this case, resolve the specific reason(s) for failure of relevant kit children.

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

2. REQUESTING A DE MINIMIS OVERRIDE OF A SCREENING FAILURE

If your product fails to qualify for Target Clean because UL screening has detected a Target Priority Chemical or a chemical prohibited in a specific product category 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 tab at https://www.ulpurview.com, 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 tab at https://www.ulpurview.com, 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.[10]

3. REPLACING GENERIC INGREDIENT NAMES WITH CONSTITUENT DISCLOSURE

The most common reason products fail to qualify for Target Clean is because their formulations contain unscreenable generic ingredient names, 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.

---

[10] 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	TARGET PRIORITY CHEM(S) (% IN COMPONENT)	PRIORITY CHEM(S) (% IN END PRODUCT)
					List each Priority Chemical + % separately	List each Priority Chemical + % separately

Target expects its vendors to make progress on reducing their use of generic ingredient names using either of the following methods[11]:

1.   Ask Your Third-Party Supplier to Register its Component on WS (Preferred Method[12])

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. Target 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.[13]

Neither the vendor using a third-party component nor Target will have access to the third-party component ingredient list. The only information that will be shared with the vendor and Target 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 Target screening list, information that the component failed the screen will be provided to you and Target, but the identity of the offending ingredient will not be shared with you or Target. 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

---

[11] 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.

[12] 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.

[13] 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.

your finished product to qualify for Clean, 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 may 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. NOTE: Replacing Your Use of Generic "Fragrance" with a Component Containing Your Entire Fragrance Palette is no longer recommended.

In the early years of the Target Clean program, some suppliers created "third-party" components that contained all the constituents that are used in all of their fragrance components. This "palette" list of all fragrance constituents allowed UL to screen products for Target's chemicals, without needing to know the specific constituents present in any given formulation. This approach is no longer recommended because if a palette component contains a single Target chemical, all products containing that component will fail to qualify for Clean, even if the actual component used in a specific product did not contain the offending ingredient. Unless a palette component is known to contain no chemicals of concern to Target, there is no efficiency advantage to managing all fragrance constituents via a single consolidated component.

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

Target (and other retailers) have high expectations regarding ingredient disclosure. Target's public goal is to "achieve transparency to all ingredients, including generics such as fragrance, in beauty, baby care, personal care and household cleaning products." To achieve this goal, all intentionally added ingredients present at > 100 ppm 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 Target's transparency expectations are easily identifiable on PurView because their ingredient list shows multiple undisclosed ingredients (as illustrated on page #18 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 Target'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://secure.supplierwercs.com/V20/Account/Login 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:
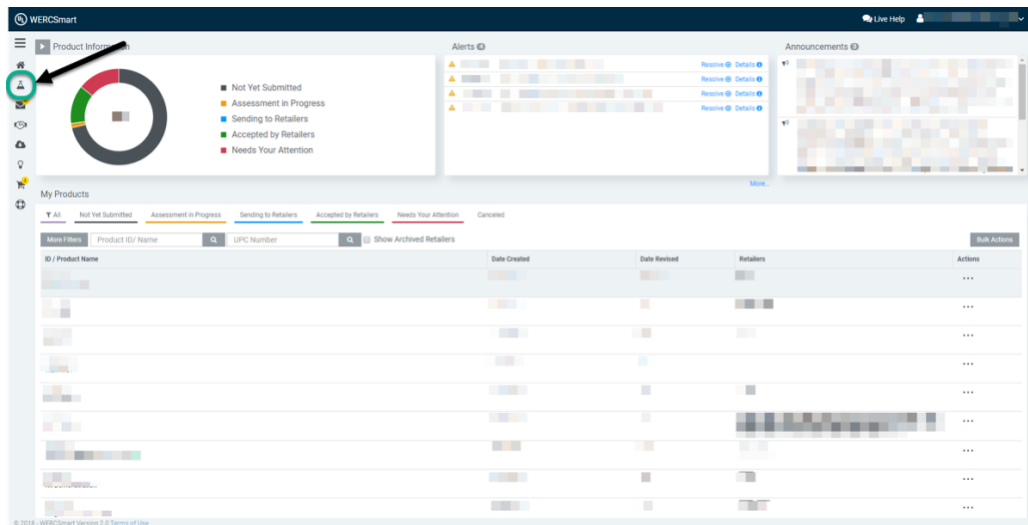
After providing a name for your component as the product name, select "Mixture, Blend, Formula, Polymer or Solution from Third (3rd, 3d) Party" as the type of product:

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. Note that Target 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 TARGET

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 Target 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). Note: UL has not currently implemented sharing the publicly disclosed ingredients in a component with either your customer or retailers.
- 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 cannot be qualified for Target's Clean program, 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. If an ingredient in your component is on Target's screening list (whether or not it is marked as "publicly disclosed"), your customer and Target are only informed the component did not pass the screen. 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 qualify for Target's Clean program.

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.

VII. DEFINITIONS OF IN-SCOPE PRODUCT CATEGORIES

A. HEALTH & BEAUTY

Exclusion: Hair dye products (defined by Target as products in Department 63 Class 01) are excluded from the scope of the current Clean program.

B. LAWN & GARDEN

Only the following Lawn & Garden Recommended Uses are in-scope:

INCLUDED WS RECOMMENDED USES	WS RU CODE
Pest Control – Aerosol	RU000116
Pest Control - Non-Aerosol	RU000919
Pesticide – Aerosol	RU000076
Pesticide - Non-Aerosol	RU000920
Repellent, Pest, Non-Aerosol	RU000945
Repellent, Pest - Aerosol	RU000966
Trap and/or bait station containing liquid bait	RU002925
Trap and/or Bait Station containing solid bait	RU000208
Insecticide - Aerosol	RU000739
Insecticide - Non-Aerosol	RU000740
Insecticide - Crawling Bug - Aerosol	RU001005
Insecticide - Crawling Bug - Non-Aerosol	RU001006
Insecticide - Flying Bug Insecticide - Aerosol	RU000736
Insecticide - Flying Bug Insecticide - Non-Aerosol	RU000737
Insecticide - Wasp and Hornet	RU000741
Insecticide - Flea and Tick	RU001407
Herbicide – Non-Selective Terrestrial – Non-Aerosol	RU000055
Animal Deterrent - Non-Aerosol	RU000671
Animal Deterrent - Aerosol	RU000163
Insecticide - Fogger (Aerosol or Gas)	RU000738
Rodenticide - Non-Aerosol	RU000921

C. OTC: OVER-THE-COUNTER

All OTC Recommended Uses except the following are in-scope:

EXCLUDED WS RECOMMENDED USES	WS RU CODE
Condom with or without Spermicide	RU000937
Diagnostic Test Strip (e.g. Glucose, Lactose, Alcohol, etc.)	RU000936
Drug Sequestration	RU001542
Empty Pharmaceutical Capsules	RU002966
In vitro diagnostic - Liquid	RU002965
In-Vitro Diagnostic - Solid	RU000287
In-Vitro Diagnostic - Solid	RU000287
CBD Oil, Liquid	RU001672
CBD Solid	RU001674
CBD Vaping Liquid	RU001673

CBD, Aerosol	RU002953

D. PHARMACY

All Pharmacy Recommended Uses except the following are in-scope:

EXCLUDED WS RECOMMENDED USES	WS RU CODE
Bandage, Adhesive	RU001375
Conductive Chemical for Medical Equipment	RU001140
First Aid Kit or Supplies	RU000721
Health Monitoring Equipment w/Battery	RU000714
Liquid Bandage	RU001199
Medical Test Kit with Alcohol Swab	RU000955
Personal Test Kit with Stabilizing Liquid	RU001011
Reusable Hot and Cold Gel Pack for Thermal Therapy	RU000506
Thermometer	RU000635

E. SUPPLEMENTS

Only the following Supplement Recommended Uses are in-scope:

INCLUDED WS RECOMMENDED USES	WS RU CODE
Alertness Aid - Liquid or Solid	RU001622
Energy or Nutritional Bars	RU000618
Energy or Nutritional Beverages/Drinks	RU000620
Energy or Nutritional Powder/Mix	RU000706
Nutritional Supplement - Solid	RU000619
Nutritional Supplement, Liquid	RU000707
Nutritional Supplement, Powder	RU000708
Vitamin	RU000616

Note that ONLY products with a Supplement or Drug Facts label type are in-scope; products with a Nutrition Facts label type are not currently included in Target Clean.