VERSION 1.0



ALTA CYCLING GROUP

VENDOR GUIDE

ALTA CYCLING GROUP, LLC $6004 \text{ S } 190^{\text{TH}} \text{ ST. STE } 101,$ KENT WA 98032

ACG VENDOR GUIDE

The Alta Cycling Group (ACG) Vendor guide is designed to guide vendors in preparing, packaging, and shipping an order for Alta Cycling Group. Material may change at any time; significant changes will be announced by E-mail to your organization's main contacts. For any questions regarding the content of this guide, please reach out to ACG Quality Assurance Team.

CONTENT

Section 1: Corporate Statements

- 1.1 Responsibilities
 - 1.1.1 Corporate Statement
 - 1.1.2 Code of Conduct
 - 1.1.3 Social Responsibility
 - 1.1.4 Sustainability and Product Impact
 - 1.1.5 Supply Chain Security CTPAT
- 1.2 Objectives
 - 1.2.1 ACG objectives
 - 1.2.2 Vendor objectives

Section 2: Vendor Registration Form

- 2.1 Vendor Information Request
- 2.2 Payment Terms
 - 2.2.1 Tax Forms

Section 3: Purchasing

- 3.1 Primary Purchasing Department Contacts
- 3.2 Item Management Purchasing Spec Process
- 3.3 Item Master
- **3.4 Purchasing Order Process**
- 3.5 Types of Purchase Orders
 - 3.5.1 Inventory POs
 - 3.5.2 Direct Shipment POs
 - 3.5.3 Photo / Sample / Testing POs
- 3.6 Order Management Production Schedule Process

Section 4: Logistics

- 4.1 Load Plan
- **4.2 Duty**
- 4.3 Booking
- 4.4 Hazardous Material

Section 5: Color and Graphics

- 5.1 On-Line Color and Graphics Files
 - 5.1.1 Graphics File use
- **5.2 Photo Shoot Sample**

Section 6: Quality and Compliance

- 6.1 General Information
 - 6.1.1 Purpose
 - 6.1.2 Applies To
 - **6.1.3 ACG Product Testing Program**
 - 6.1.4 Nominated Lab Partners

6.2 Testing Procedures

- **6.2.1** Corporate Company Policy
- 6.2.2 Product Development Testing
- 6.2.3 Initial Product Testing
- **6.2.4** Periodic Testing
- 6.2.5 Material Changes
- **6.2.6 Test Failures**
- **6.2.7** Selling Partner Testing Requirements

6.3 Quality Control, Product Inspections

- 6.3.1 Incoming Quality Control
- 6.3.2 Outbound Product Quality Control
- **6.3.3 Tracking Label Requirements**
- 6.3.4 Carton Labels
- **6.3.5** Packaging Compliance
- 6.3.6 Documentation
- **6.3.7 Inbound DC Inspections**

6.4 Restricted Substances & Additional Requirements

6.4.1 ACG RSL

- 6.4.2 California Prop 65
- 6.4.3 VT, OR, ME, WA Regulations
- 6.4.4 Flame Retardants

6.5 Legal Regulations

- 6.5.1 Consumer Product Safety (CPSC / CPSIA)
- 6.5.2 E-PAC / E-Bike Requirements, UL Certs., UN Testing
- 6.5.3 Federal Hazards Substances Act 16 CFR 1500.48-53
- 6.5.4 Material Safety Data Sheets

<u>Section 7:</u> Appendix – SOP Document copies

Section 1: Corporate Statements

1.1 Responsibilities

1.1.1 Corporate Statement

Alta Cycling Group is a premier cycling company offering premium bicycles, bicycle parts and accessories. Our brands include Diamondback and Redline. Alta is committed to constant innovation, cutting-edge technology, and providing the best possible experience for our customers.

1.1.2 Code of Conduct

The Code of Conduct set forth by ACG shall apply to Alta Cycling Group as well as all Vendors and Sub-vendors that supply products to ACG and outlines the basic requirements with respect to employee treatment and work environment

1.1.3 Social Responsibility

ACG requires all business partners to conduct a review of corporate practices to ensure the social well-being of their employees and their responsibility to those employees. This review can extend to sub-vendors and contractors.

ACG may request a Social Audit of Vendor's facilities. Vendor must respond promptly to such requests, from ACG or designated Auditors, and must grant reasonable access to its premises and employees for the purpose of completing such audits. (Generally recognized, current Social Compliance certificates, e.g., SA8000, may be suitable in place of a new audit. We encourage vendors to provide such documentation proactively to minimize the need for additional requests for information.)

1.1.4 Sustainability and Product Impact

ACG strives to have a positive relationship with the environment and our community. ACG has a goal to become carbon neutral through continuing reduction, replacement, or off-set of carbon emission. ACG will align itself with global GHG Protocols and similar international guidelines.

ACG will evaluate the impact our brands have on the environment as it pertains to Animal Welfare, Chemical Management, DEI, Fair Trade Practices and Environmental Stewardship and endeavor to reduce our footprint

1.1.5 Supply Chain Security

ACG is dedicated to ensuring the security of its Supply Chain and encourages all Vendors to implement security measures, procedures and policies consistent with US Customs' CTPAT - Minimum Security Criteria - Foreign Manufacturers (cbp.gov)

ACG may require Supply Chain Security compliance audits at the request of Selling partners. ACG encourages Vendor to proactively supply C-PTAT ID# or mutually recognized AEO equivalent certificate to minimize disruption. (See <u>Authorized Economic Operator (AEO) Programs - CTPAT: Customs Trade Partnership Against Terrorism | CTPAT Advisors (c-tpat.com)</u>)

1.2 Objectives

The On-boarding process is to provide the vendor with a proper foundation for operational success as an Alta Cycling business partner.

1.2.1 ACG Objectives

ACG will strive to provide all the information and support to successfully fulfill the requirements established in the corporate agreement within an acceptable timeline.

1.2.2 Vendor's Objectives

ACG expects the Vendor to review and understand all the appropriate guidelines set forth, but not limited to this Vendor On-boarding Guide.

The Vendor is to communicate quickly and effectively with ACG with any concerns that may jeopardize their ability to meet any of the portion of the agreement or timeline.

Section 2: Vendor Registration

2.1 Vendor Information Request

New Vendors will fill out a Vendor Information Request Form detailing the Company's name, and address as well as that of the Factory. This form is to include payment terms, currency, and Banking information. See appendix below for attachment. Please include all DBA's and relevant subsidiaries of Vendor

2.2 Payment Terms

Based on the negotiated Vendor agreement payment can be either net 30 or net 60 days.

2.2.1 Tax Forms

All Vendors will complete appropriate US Tax forms:

• Domestic Vendors within the United States will complete IRS form W-9 (link)

- Foreign Vendors that are reporting as an Individual are required to fill out a W-8BEN tax form
- Foreign Vendors that are reporting as Entities are required to fill out a W-8BEN-E tax form

Section 3: Purchasing

3.1 Primary Purchasing Dept. Contacts

All communication between the Vendor and ACG Purchasing must include the following contacts:

- Vice President of Supply Chain
- Director of Purchasing
- Senior Purchasing Coordinator

3.2 <u>Item Management – Purchasing Spec Process</u>

During the development process, vendor shall assign a Purchasing Spec Number (PSR#) to each bicycle Model's Bill of Materials. This number can be any convenient Model ID number already used internally by Vendor to uniquely identify each model and model year. The PSR# will be indicated on all ACG Purchase Orders. The same PSR# can be used for multiple sizes and colorways of the same Model and Model Year. In the event a PSR# or BOM changes after confirmation, Vendor shall inform ACG Product Development and Purchasing Department by providing an updated BOM, highlighting the changes, and providing a revised PSR#. The updated cover sheet of the purchasing spec should include the effective date of the change, any existing POs affected by the change, and the updated price.

Example:

SPEC#	Revision #	Model	Price	Date	POs Affected	Comment
US021909	01	TOKUL 3	183.20	5-Feb-18		
US021909	02	TOKUL 3	189.63	11-Apr-18	U118S	Tire change CST-VEE
US021909	03	TOKUL 3	189.37	20-Apr-18	U117S3	Brake change to Tektro

3.3 <u>Item Master</u>

At the beginning of each model year an Item Master will be provided to the vendor by ACG listing the items ACG will be purchasing for that model year.

The Item Master includes detailed information for each ACG Part Number (SKU), including UPC, Model Name, and Item Description which includes size and color.

3.4 Purchase Order Process

ACG purchasing will submit purchase orders via email.

The purchase order will indicate item, quantity, purchase price, and requested ship date.

Vendor will confirm the purchase price and estimated ship date promptly, generally within 10 business days of receiving the purchase order. Vendor will include accepted Purchase Orders in the next weekly Production Schedule and will return Proforma Invoices to ACG's Primary Purchasing Contacts.

3.5 **Types of Purchase Orders**

ACG will submit four types of purchase orders – inventory POs, direct shipment POs, photo/sample POs, and test POs

- **3.5.1** <u>Inventory POs</u> standard Mass Production Purchase Orders that ship to the ACG distribution center specified on the purchase order.
- **3.5.2** <u>Direct Shipment POs</u> Mass Production Purchase Orders that ship to ACG's customer directly. ACG will provide the destination address and freight forwarder information. Vendor will confirm container requirements the same time as delivery schedule and purchase price when providing the proforma invoice. Vendor should advise ACG if Purchase Order quantities should be revised to fully be shipped within a reasonable number of 40' containers. ACG POs should ship in 40'GP or 40'HQ dry van (42G0 / 45G0), any other containerization requires written approval.

See ACG Shipping and Compliance instructions, below.

- **3.5.3** Photo / Sample / Testing POs A sample must be reviewed and approved by ACG before mass production. ACG purchasing will submit POs for samples prior to or with mass production POs
 - 1) Photo -Vendor will send photos to ACG's Marketing and Product Development department to approve color, decals, and specification. See ACG photography requirements guide, attached. These photos for approval can be any clear picture (e.g., phone camera), no need for professional, though all angles of product are required.
 - 2) <u>Sample</u> In addition, approved samples should be photographed at photo studio local to vendor agreed between vendor and ACG, on ACG's account. Please see the Photography Requirements provided separately for additional details.
 - After the photoshoot is complete, ACG will advise vendor of sample disposition.
 - 3) <u>Testing POs</u> Ship to ACG's designated laboratory for testing All Juvenile or Youth Bikes sold in the United States require testing at a CPSC accredited 3rd

party facility, as do certain other models. See below regulatory compliance instructions.

3.6 Order Management – Production Schedule Process

Vendor will provide weekly updates of pending Purchase Orders via the Production Schedule Process.

Vendor will complete ACG's production schedule template with all required information. Each week, the production schedule update should be emailed to the ACG Primary Purchasing Contacts, even in the event no Purchase Orders have been created or modified.

Section 4: Logistics

4.1 General Information

The ACG Logistics team will supply a copy of a current ACG Overseas Shipping Compliance Instructions (found in Section 7: Appendix and SOP Document Copies 4.1) well in advance of the ready date of goods vessel space must be secured for transport. Vendor will provide ACG Logistics a container shipping forecast 90 days' (3 months) in advance of ship date. ACG will share container forecast with Ocean Carriers for vessel space allocation. All cargo bookings will be made by the vendor at least 3 weeks prior to sailing. Logistics will require vender prepare an ISF filling using format provided by ACG customer's broker. Freight terms are generally FOB unless otherwise agreed upon. Bills of Lading should be issued as Sea-Way Bills not as Originals that require a Telex Release unless special approval has been acquired by ACG Purchasing.

All communications concerning logistics should include the following.

- Logistics Manager
- Logistics Coordinator

4.2 **Shipping Forecast**

Vendor will supply ACG Logistics a 3-month forecast of needed container volume in TEU. ACG will share the forecast with vessel operators to plan for vessel space. Forecasts should be reviewed by vendor 6 weeks prior to ship date and adjusted as needed. Send to the ACG Logistics team when complete. Example below. (See Section 7 4.2)

Shipping Forecast EX	AMPLE PURPOSES O	NLY	
Origin	Destination	Volume (in TEUs)	Supplier
Cai Mep/HO Chi Mihn	Pataskala	22	
Ningbo		4	
Kaohsiung		0	
Laem Chabang		0	
Cai Mep/HO Chi Mihn	Pataskala	22	
Ningbo		4	
Kaohsiung		0	
Laem Chabang		0	
Cai Mep/HO Chi Mihn	Pataskala	26	
Ningbo		4	
Kaohsiung		14	
Laem Chabang		0	
	Origin Cai Mep/HO Chi Mihn Ningbo Kaohsiung Laem Chabang Cai Mep/HO Chi Mihn Ningbo Kaohsiung Laem Chabang Cai Mep/HO Chi Mihn Ningbo Kaohsiung Laem Chabang Cai Mep/HO Chi Mihn Ningbo Kaohsiung	Origin Destination Cai Mep/HO Chi Mihn Pataskala Ningbo Kaohsiung Laem Chabang Cai Mep/HO Chi Mihn Pataskala Ningbo Kaohsiung Laem Chabang Cai Mep/HO Chi Mihn Pataskala Ningbo Kaohsiung Laem Chabang Cai Mep/HO Chi Mihn Pataskala Ningbo Kaohsiung	Origin Destination Volume (in TEUs) Cai Mep/HO Chi Mihn Pataskala 22 Ningbo 4 Kaohsiung 0 Laem Chabang 0 Cai Mep/HO Chi Mihn Pataskala 22 Ningbo 4 Kaohsiung 0 Laem Chabang 20 Ningbo 4 Kaohsiung 20 Laem Chabang 20 Kaohsiung 10 Laem Chabang 21 Ningbo 21 Ningbo 32 Ningbo 34 Kaohsiung 14

4.3 **Booking / Shipping Cargo**

Refer to the ACG Overseas Shipping Compliance Instructions when preparing shipping. All shipments should be booked at least 3 weeks prior to sailing. An Importer Security Filing should be prepared 72 hours prior to loading cargo into the container. ISF blank template found in Section 7 of this guide. All containers should be inspected for damage before loading. Vendor partners should have on file and supply the container inspection report to ACG upon request, in the event of damage in transit. A Bill of Lading will be created (see Section 7.4.2) to accompany other shipping documents which include Commercial Invoice, Packing List, Containerized Load Plan, and Certificates of Conformity.

4.4 Hazardous Material

Vendors who ship Hazardous Materials to ACG, especially including e-bikes and e-bike batteries, should be familiar with the requirements for shipping Class 9 hazardous material.

4.4.1 <u>Lithium-ion E-Bike Batteries</u> Lithium-Ion batteries are Hazardous Material and subject to all regulations for a Class 9 hazardous material. Vendors must declare appropriately, see below.

Travelling by Ocean

- UN Code UN3480 (battery only) / UN3481 (battery packed with equipment)
- Packing instruction PI965
- Labels CLASS 9
- Documents DG shipping doc. Required

<u>Travelling by Air</u> (cargo aircraft only, not allowed on passenger aircraft)

- UN Code UN3480 (battery only) / UN3481 (battery packed with equipment)
- Packing instruction PI965
- Labels CLASS 9
- Documents DG shipping doc. Required

<u>SMALL BATTERIES EXEMPT</u>: Class 9 labels are required on all e-bike batteries and other large lithium-ion batteries. Not required for very small batteries in equipment, e.g., computer head unit or calculator.

4.4.2 E-Bike with Battery Shipment

All E-Bikes must be shipped with the battery securely installed in the bike. Vendors should properly declare such shipments as UN3171 – battery-powered vehicle. Do not package the battery separately in the box.

Battery Installed on Bike

Travelling by Ocean

- UN Code UN3171
- No packing Instructions
- Labels if meets SP 961, No Label
- Documents No IMO required

<u>Travelling by Air</u> (cargo aircraft only, not allowed on passenger aircraft)

- UN Code UN3171
- Packing instruction PI952
- Labels CLASS 9
- Documents DG shipping doc. Required

DOMESTIC AND INTERNATIONAL SHIPPING REQUIREMENTS

		Air	Ocean		Ground	
		Fed-Ex	Container Ship	Rail	Truck – LTL (Pallet)	Truck – Indiv. Parcel
Battery Installed	UN Code	UN3171	UN3171	UN3171	UN3171	UN3171
	Packing Instructions	PI 952	None	None	None	None
	Special Provisions	A21	SP 240, 961	SP 240, 961	SP 240, 961	SP 240, 961
	Labels	Class 9	If SP 961, no label	No label req.	No label req.	No label req.
	Documents	DG ship	No IMO doc	No doc. req.	No doc. req.	No doc. req.
	Surcharge	Yes	No	No	No	No
Uninstalled but	UN Code	UN3481	UN3481	UN3481	UN3481	UN3481
included with bike	Packing Instructions	PI 966 (PGII Box)	PI 966 (PGII Box) Sec. 1	PI 966 (PGII Box) Sec. 1	PI 966 (PGII Box) Sec. 1	PI 966 (PGII Box) Sec. 1
	Special Provisions	Sec. 1	None	None	None	None
	Labels	Class 9	Class 9	Class 9	Class 9	Class 9
	Documents	DG ship doc.	DG ship doc.	DG ship doc.	DG ship doc.	DG ship doc.
	Surcharge	Yes	Yes	Yes	Yes	Yes
Batteries Only	UN Code	UN3480	UN3480	UN3480	UN3480	UN3480
	Packing Instructions	PI 965	IMDG	None	None	None
	Special Provisions	Sec 1A <30% charge	Sec 1A <30% charge	Sec 1A <30% charge	Sec 1A <30% charge	Sec 1A <30% charge
	Labels	Class 9	Class 9	Class 9	Class 9	Class 9
	Documents	DG ship doc.	DG ship doc.	DG ship doc.	DG ship doc.	DG ship doc.
	Surcharge	Yes	Yes	Yes	Yes	Yes

Assumption: All batteries have been tested to UN Manual of Tests and Criteria, Part III, Subsection 38.3.1. Supporting documents available from factory.

Section 5: Color and Graphics

5.1 On-line Color and Graphics Files

Alta Graphics department will place all art files and color and graphics packages in an online file sharing platform, as of 2021, Basecamp. Vendor will receive login credentials to share and download information; please request if not yet received.

 ACG will share a folder with images and documents that apply to many models, including warning labels, carton art, frame size stickers, bike classification stickers, Owner's Manuals and Assembly Guides. Each bicycle models' graphic file number will be included on ACG Purchase Orders and can be found in the appropriate directory by brand and model.

5.2 Photoshoot Setup Guidelines

Alta Graphics department photoshoot guideline can be found below, outlining lighting, angles, and bicycle set-up.

https://accellna.egnyte.com/dl/A9hsmD7efP

Section 6: Quality and Compliance

6.1 General information

6.1.1 ACG Objectives

ACG has a Quality and Compliance policy that ensures compliance with applicable laws, regulations, and quality standards. Goals, quality levels and timelines are required by all ACG vendors.

6.1.2 Applies To

This Quality and Compliance policy applies to all Factories, Sub-assembly providers, and component manufacturers as defined by ACG.

6.1.3 ACG Product Testing Program

All products supplied to ACG must comply with all applicable laws, regulations, and guidelines, as well as ACG quality standards.

Vendor is required to have a complete understanding of requirements and regulations outlined by, USA 16 CFR 1512, CPSC / CPSIA and ISO standards. All products shipped to the United States must meet or exceed CPSC standards, even if not explicitly described in Alta's BOM. Products shipped to other markets must meet the relevant standards for that market, e.g., EU EN, AUS CCA, etc.

During mass production, periodic testing and inspections are necessary to maintain product integrity.

ACG may at any time request products be shipped to an accredited 3rd party testing facility to assure compliance.

6.1.4 Nominated Lab Partners

ACG works with several CPSC accredited labs as testing partners for its Quality and Compliance policy. ACG will send Testing POs as noted above. ACG or its agents may

additionally request units from Mass Production POs be sent to accredited lab for testing at any time.

6.2 <u>Testing Procedures</u>

6.2.1 Testing Program overview

The ACG testing program addresses the reasonable testing product requirements required by the United States Consumer Product Safety Commission (CPSC), among other requirements.

Testing will occur during several phases, including product development, sample checking, on-line (mass production) quality checks, Packaging, and shipping tests, and other periodic or on-demand product

6.2.2 Product Development Testing

During product development, vendors will coordinate closely with ACG's Product Development department.

All frame platforms require testing (ISO 4210-6 Frame and Fork Fatigue test) and approval. Most rigid, alloy frame test certificates are permitted from Vendor's in-house or designated lab. More complex new frame platforms like carbon fiber or full suspension, ACG PD will advise Vendor if sample frames must be tested by 3rd-party lab in addition.

Approved frame test must be provided to ACG before mass production begins.

Products tests may include but not limited to ISO 4210-6, ASTM F2680 Frame and Fork Fatigue test to ensure structural integrity.

6.2.3 Initial Product Sample Testing

Initial product testing is to be performed at the introduction of a new production run.

For Adult units that do not require 3rd party independent testing, a reasonable approved testing program must be established to verify that products meet CPSC

Vendor must document the following for each production run

- Consumer Product Safety Commission tests required under 16 C.F.R. Section 1512, except for frame or fork energy testing
- Braking performance pursuant to applicable CEN/ISO standards
- Front wheel retention pursuant to applicable ASTM standards

- CPSIA, California Proposition 65, and Washington State CPSA (where applicable), including:
 - Cadmium content
 - Phthalate content
 - Lead content
- ACG RSL requirements
- Cosmetic check per ACG's C & G guidelines
- Verification that all components meet the specifications in the Bill of Materials
- Approved packaging and carton labeling

Each model year, all Juvenile / Youth and BMX bikes will be sent for testing to ACG's 3rd-party accredited lab prior to mass production. Testing PO's will be provided, see above.

ACG products are to be packaged to ISTA standards. Vendor is generally responsible for the development and design of suitable packaging to meet these standards. Products should meet Drop and Vibration test standards, see below.

6.2.4 Periodic Testing

Both adult and youth products may be subject to random periodic testing in addition, at the request of ACG or Alta's selling partners.

6.2.5 Material Changes

Any change to the production assembly process or component specs from the approved Purchasing spec as noted on ACG's Purchase Order section must be approved in writing by ACG Product Development or Purchasing.

6.2.6 Test Failures

In the event of a failure during product testing, vendor must provide the ACG QC team with a corrective action plan detailing the cause of failure and the resolution. Vendor is responsible to supply components that comply with CPSC regulations as well as ACG's quality standards and RSL requirements.

6.2.7 Selling Partner Requirements

Alta selling partners may have requirements in addition to standard requirements, for example, testing, labeling, or product specification. Supplier may be required to download and follow a specific carton label or container load plan. Supplier will comply with Alta selling partners' reasonable requests accompanying its Purchase Orders. Alta does not expect Supplier to bear excessive direct expense for Selling Partner

requirements but will forward to Supplier any vendor chargebacks received for non-compliance.

6.3 Quality Control, Product Inspections

6.3.1 Incoming Quality Control

Prior to the start of mass assembly, the Vendor is responsible to inspect all frames, forks and components to confirm they meet the following criteria:

- Frames and Forks are inspected and comply with 16 CFR 1512.4
- If Frame and Fork supplier applies paint and decals, Frame and Fork Color and Graphics are correct. Paint application inspected.
- Components and sub-assembly parts are correct and match the Purchasing Spec BoM. Appropriate quantities are ordered to satisfy mass production
- Sub-assembly frame parts are securely installed and properly torqued.
- Incoming Quality Assurance report check list for frames and sub-assemblies needs to be completed and included with documentation (Example see 6.3.1)

6.3.2 <u>Outbound Mass Production Quality Control Processes</u>

Processes

Adult bicycles must supply in writing certification of compliance with all consumer product safety rules and standards. The written certificate, General Certificate of Conformity (GCC) must be based upon the results of a test of each product or a reasonable testing program. A reasonable testing program must be based on the CPSC 16 CFR 1512.18 tests and test procedures. ACG bicycles may be selected at the start of a production run or periodically to confirm compliance (see 6.3.2 (a))

Vendor will follow ACG's QC standards in production. A Quality Control report shall be created during all production runs. ACG's representatives may be present at Vendor's facility during production to assist or create these reports. Vendor will provide reasonable accommodation and support to ACG's representatives to complete this process.

The In-Line Quality Assurance report is an example of a product assembly and compliance verification document. Based on the Complete QA report (see above), the In-Line check verifies that each unit has been assembled to the CPSC 16 CFR 1512 guidelines that if tested, would fully comply to government regulations.

• An In-Line production check list is required to be performed during each production run.

- Check list includes specific assembly instructions include the application of grease, torque values as well as component placement.
- Check list includes visual inspection for cosmetic and structural components as well as sticker and graphic placement.
- Check list includes a functionality test of assembly components and their compatibility on the bike of all units during assembly.
- Check list includes testing of electric motor, charger, charge port, display and wire connections. Confirm correct software installation.
- Check list includes additional parts, accessories, and manuals not attached to the bicycle during factory assembly are correctly packaged with the unit.
- Check list includes ride testing of select units to confirm quality.
 (See 6.3.2 (b))

6.3.3 Tracking Label Requirements

Per CPSC regulation 16 CFR 1512.19(e), ISO 4210-2 6.1, and ASTM F2268 standards, all bicycles are required to be properly labeled. For carton labeling, see sec. 6.3.4.

a) All require a serial number that is affixed to the frame as listed in 16 CFR 1512.19(e). ACG follows ASTM F2268 standard for serial numbers. (See 6.3.3(a))

The serial number must be constructed as listed in ASTM F2268 4,5:

- 11 alphanumeric characters minimum
- 1,2,3 denote manufacturer and facility
- 4,5 denote year of production
- 6 denotes month where A= January, B= February, C= March, etc.
- 7 through 11+ denote production numbers



b) Under 19 CFR 1304 all products imported into the United States shall have the Country of Origin permanently and legibly marked in a conspicuous place.

Vendor must follow all relevant local export rules as well as US customs standards. This information may be combined with the Tracking Label (see below), or independent of it.



c) All Juvenile / Youth bicycles with wheels 24" and under, require a Tracking Label as per CPSC section 14(a)(5) and CPSIA section 103. to assist consumers, identify the model, manufacturer, date, and batch of production of a unit. Example of tracking label bellow, see attachments for detailed instructions

Made in China for

Alta Cycling Group, LLC.

Kent, WA 800-251-5435

Model ID#

Batch / Serial #

- d) E-bike Classification Decals are intended to be placed under clearcoat. They must be permanently affixed and contain the classification number, top assisted speed, and motor wattage. (See section 6.5.2)
- e) Other labels and decals are as noted in the Graphics file per model, as well as in the General Brand guidelines, including Size stickers, warning labels, etc. See ACG's vendor file sharing system, above. All decals should be placed on the frame for sample checking. If the final decals are not available by the time of Sample Check, vendor can print test labels on standard paper and affix to frame in appropriate position for approval.

6.3.4 Carton Labels

- a) All cartons are required to include, per 16 CFR 1512.19(b)(c)
 - 1512.19(b) "A bicycle less than fully assembled and fully adjusted shall have clearly displayed on any promotional display material and on the outside surface of the shipping carton the following: (1) A list of tools necessary to properly accomplish assembly and adjustment, (2) a drawing illustrating the minimum leg-length dimension of a rider and a method of measurement of this dimension)
 - 1512.19(c) The minimum leg-length dimension shall be readily understandable and shall be based on allowing no less than one inch of clearance between (1) the top tube of the bicycle and the ground plane and (2) the crotch measurement of the rider. A girl's style frame shall be specified in the same way using a corresponding boys' model as a basis.



b) The Carton Artwork contains 5 ASTM product usage identifiers. These boxes need to be checked to match the appropriate boxed product. Alta Product Development will provide the appropriate classification chart per model, or it will be specified in the Graphics file.

CONDITION	DESCRIPTION
	This is a set of conditions for the operation of a bicycle on a regular paved surface where the tires are intended to maintain ground contact.
	This is a set of conditions for the operation of a bicycle that includes Condition 1 as well as unpaved and gravel roads and trails with moderate grades. In this set of conditions, contact with irregular terrain and loss of tire contact with the ground may occur. Drops are intended to be limited to 15cm (6") or less.
\sim	This is a set of conditions for operation of a bicycle that includes Condition 1 and Condition 2 as well as rough trails, rough unpaved roads, and rough terrain and unimproved trails that require technical skills. Jumps and drops are intended to be less than 61cm (24").
	This is a set of conditions for operation of a bicycle that includes Conditions 1, 2, and 3, or downhill grades on rough trails at speeds less than 40 km/h (25 mph), or both. Jumps are intended to be less than 122cm (48").
◆ ◆	This is a set of conditions for operation of a bicycle that includes Conditions 1, 2, 3, and 4; extreme jumping; or downhill grades on rough trails at speeds in excess of 40 km/h (25 mph); or a combination thereof.

c) Cartons are required to have End Carton Labels printed and placed, one at each end of the carton.

End Carton labels are required to the following information from ACG Purchase Order

- 1) Ship to Address
- 2) Purchase Order Number
- 3) Bike Description, Including Size and Color
- 4) Part Number Barcode and Part Number
- 5) UPC Barcode and Number
- 6) PSR# Purchasing Spec. Revision Number
- 7) CG Number Color and Graphics Number
- 8) Vendor Production information and Dims
- 9) Serial Number and Barcode

Carton Labels may vary depending on intended customer, selling partner and warehouse.

Alta Cycling Standard Carton Label



6.3.5 Packaging Requirements

ACG products should be packaged as per ASTM – ISTA 6 SIOC Protocols. (<u>ISTA, Your Alliance</u> in Transport Packaging, is the world leader in Performance Tests for Packaged-Products)

This protocol consists of a series of drop tests and package vibration tests to evaluate packaging quality.

6.3.6 Documentation

All product shipments must be accompanied with factory issued compliance documentation such as but not limited to COC/GCC (Certification of Conformity), CPSIA (CPC) and MSDS sheets

a) For bicycles produced for the United States, an accompanying COC/GCC must state that the factory adhered to the standards and requirements outlined in 16 CFR 1512. (See 6.3.6(a))

- b) Youth bicycles produced for the United States require a Children's Product Certificate (CPC) based on test results from an accredited lab. Similar to a COC/GCC, the CPC is specific to youth bikes. (See 6.3.6(b))
- c) E-Bikes Lithium-Ion batteries must comply with UN38.3. test for the transportation of hazardous material. This, with an accompanying MSDS sheet are required with each shipment of batteries and e-bikes. (See 6.3.6(c))
- d) Completed Incoming QA report, In-Line QA report.
- e) List of frame serial numbers, applicable component serial numbers per PO#

6.4 Restricted Substances & Additional Requirements

6.4.1 ACG Restricted Substance List

Vendors must be familiar with and adhere to ACG's RSL policy.

All bicycles produced for Europe are required to adhere to REACH and RoH banned and restricted chemical standards.

6.4.2 California Proposition 65

All bicycles produced for the Unites States must adhere to California Prop. 65 (Phthalates), CPSIA (total Lead and Cadmium content), and BPA plus various State specific regulations (see sec. 6.4.3). for paints, metals, plastics, and contact points. Examples are provided below.

<u>California Proposition 65 Phthalates (examples)</u>

Phthalate Sample ID List			
Sample ID #	Description		
1	Handlebar - Grip		
2	Shifter Grip		
3	Saddle Cover		
4	Tires		

	Phthalates (14P) Contents				
Test Items(s)	CAS No.	Test Results (PPM)			
		#1	#2	#3	#4
DBP	84-74-2	ND	ND	ND	ND
BBP	85-68-7	ND	ND	ND	ND

DEHP	117-81-7	ND	ND	ND	ND
DINP	28553-12-0	ND	ND	ND	ND
	(68515-48)				
DNOP	117-84-0	ND	ND	ND	ND
DIDP	26761-40-0	ND	ND	ND	ND
	(68515-49-1)				
DIBP	84-69-5	ND	ND	ND	ND
DCHP	84-61-7	ND	ND	ND	ND
DPENP	131-18-0	ND	ND	ND	ND
DHEXP	84-75-3	ND	ND	ND	ND
DEP	84-66-2	ND	ND	ND	ND
DMEP	117-82-8	ND	ND	ND	ND
MnBP	131-70-4	ND	ND	ND	ND
TBPH	26040-51-7	ND	ND	ND	ND

California Proposition 65 Lead and Cadmium Check (examples)

	Lead and Cadmium					
Sample ID #	Description	Color	Lead (Pb) ppm	Cadmium (Cd) ppm		
20180704-35	Saddle Rail	Black	<1	< 1		
20180704-36	RD Guard	Black	< 1	< 1		
20180704-37	RD Main Body	Gray	10.73	< 1		
20180704-38	Crank Arm	Black	16.71	< 1		
20180704-39	Crank Sprocket	Black	8.61	< 1		
20180704-40	Pedal	Black	19.68	< 1		
20180704-41	Brake Lever	Gray	5.29	< 1		
20180704-42	Brake Arm	Black	12.19	< 1		
20180704-43	Fork Leg	Blue	1.96	< 1		
20180704-44	Fork Leg	White	11.76	< 1		
20180704-45	Fork Leg	Silver	6.76	< 1		
20180704-46	Frame	Blue	1.12	< 1		
20180704-47	Frame	Silver	3.37	< 1		
20180704-48	frame	White	< 1	< 1		
20180704-49	Wheel Spokes	Black	17.70	< 1		

<u>California Proposition 65 BPA (Bisphenol – A) Check (examples)</u>

Bispl	Bisphenol – A (BPA) Compliance Criteria: < 2 ppm					
Sample ID #	Description	Color	BPA			
1	Handlebar Grip	Black	2.23			
2	Shifter Grip	Black	ND			
3	Saddle Cover	Black	ND			

6.4.3 ME, OR, VT, WA Regulations

Currently Maine, Vermont, Oregon, and Washington require registration and reporting for chemicals that may be lower than that allowed under CA Prop 65. To the specific chemicals on outlined in chemical list must be below 100ppm.

6.4.4 Flame Retardants

ACG Vendors must ensure that no added chemical flame retardants are used in any fabric component for all ACG products, including saddles, cases, and covers.

6.5 Legal

Vendors must be aware and are responsible for complying with all applicable U.S. (Federal and State) and International legal requirements, even if not explicitly detailed here.

6.5.1 Consumer Products Safety Commission (CPSC / CPSIA)

All products produced for ACG must comply with Consumer Product Safety Commission (CPSC) regulations, including the Consumer Products Improvement Act (CPSIA) of 2008. The CPSIA also requires manufacturers or importers of non-children's products to issue a General Certificate of Conformity (GCC).

Additionally, the manufacturer or importer of children's products is required to issue a written Children's Product Certificate (CPC) which certifies that its children's product complies with all applicable children's product safety rules and has passed a 3rd party testing regiment.

6.5.2 E-Bike Requirements, UL Certs., UN Testing

In conjunction with CPSC/CPSIA regulations 16 CFR 1512 for bicycle safety and function, all e-bikes are required to provide UN38.3 testing reports for battery safety, and UL certificate for battery and charger

E-bikes designated for sale in Europe must comply with EN 15194.

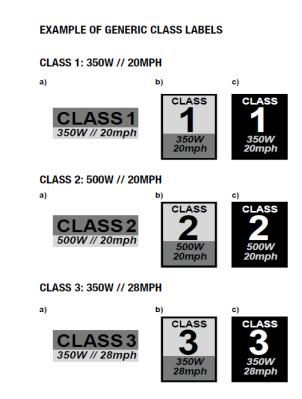
E-bikes sold in the US shall be evaluated by supplier and properly labeled as per the classification system below. For more information about the classification system, (State Electric Bicycle Laws | A Legislative Primer (ncsl.org))

WHAT YOU NEED TO KNOW ABOUT THE eBIKE CLASSIFICATION & LABELING:

SECTION 1.

Section 312.5 is added to the Vehicle Code, to read: 312.5.

- (a) An "electric bicycle" is a bicycle equipped with fully operable pedals and an electric motor of less than 750 watts.
- (1) A "class 1 electric bicycle," or "low-speed pedal-assisted electric bicycle," is a bicycle equipped with a motor that provides assistance only when the rider is pedaling, and that ceases to provide assistance when the bicycle reaches the speed of 20 miles per hour.
- (2) A "class 2 electric bicycle," or "low-speed throttle-assisted electric bicycle," is a bicycle equipped with a motor that may be used exclusively to propel the bicycle, and that is not capable of providing assistance when the bicycle reaches the speed of 20 miles per hour.
- (3) A "class 3 electric bicycle," or "speed pedal-assisted electric bicycle," is a bicycle equipped with a motor that provides assistance only when the rider is pedaling, and that ceases to provide assistance when the bicycle reaches the speed of 28 miles per hour, and equipped with a speedometer.
- (b) A person riding an electric bicycle, as defined in this section, is subject to Article 4 (commencing with Section 21200) of Chapter 1 of Division 11.
- (c) On and after January 1, 2017, manufacturers and distributors of electric bicycles shall apply a label that is permanently affixed, in a prominent location, to each electric bicycle. The label shall contain the classification number, top assisted speed, and motor wattage of the electric bicycle, and shall be printed in Arial font in at least 9-point type.



6.5.3 Federal Hazardous Substance ACT 16 CFR 1500.20

Items deemed as Toys by CPSC, such as push or run bikes, require extra warning labels under 16 CFR 1500.48-53 alerting the potential to choking hazards that mat be associated with this product. Juvenile bikes with pedals are not Toys for this purpose.

6.5.4 Material Safety Data Sheets

Material Safety Data Sheets (MSDS) or PSDS forms outlining the chemicals and safety protocols associated with those chemicals is required to accompany any shipment of battery and battery cells provided with the product.

Section 7 : Appendix and SOP Document Copies

Guide Section / Reference	Department	SOP Description	Document
1.1.2	Corporate	Code of Conduct	Code of Conduct 20211102.docx
1.1.3	Corporate	Social Audits	SA8000 Certificate Example.doc
1.1.4	Corporate	Sustainability and Product Impact	
1.1.5	Corporate	Supply Chain Security – CT PAT	CTPAT - Minimum Security Criteria - Foreign Manufacturers (cbp.gov)
2.1	Vendor Registration	Vendor Information Request	Vendor Information Request.xlsx
2.2.1	Vendor Registration	Tax Forms	W9 to be returned Form W-8BEN Form W-8BEN-E to ANA.pdf (individual).pdf (Rev.pdf
3.0	Purchasing	Vendor On- Boarding Purchasing Doc	Vendor Onboarding Purcha

3.6	Purchasing	Production Schedule Template	_ProductionSchedu le Template -FACTOF
4.1	Logistics	Shipping Guidelines	Alta Cycling Group Overseas Shipping (
4.2	Logistics	Shipping Forecast	ACG Vessel Space Forecast.xlsx
5.1	Graphics	On-Line Graphic Files	See Graphics for Log-in Credentials
5.2	Graphics	Photoshoot	https://accellna.egnyte.com/dl/A9hsmD7efP
6.2.2	Testing Procedures	Product Development Testing	ALTA - SOP New Product ISO test pla
6.2.3	Testing Procedures	16 CFR 1512	SUBPART - Regulations (govregs.com)
6.3.1	QC, Product Inspections	Incoming Quality Check	Incoming Quality Assurance Report.doc
6.3.2 (a)	QC, Product Inspection	Quality Assurance Report	Complete Bicycle Quality Assurance Res
6.3.2 (b)	QC, Product Inspection	In-Line Quality Check	In-Line Quality Assurance Report.doc

		ASTM F2268	
6 2 2 (2)	QC, Product	Bike Serial	
6.3.3 (a)	Inspection	Number	F2263 Bike serial number standard.pdf
		Standards	
6 2 2 (1-)	QC, Product	Country of	PDF PDF
6.3.3 (b)	Inspection	Origin	19 CFR 1304 - Marking-of-COO-o Markings of Countr _, n US-Imports.pdf
6.3.3 (c)	Product Inspection	Tracking Label	Alta Cycling Tracking Label SOP (
	Product	E-Bike	w w
6.3.3 (d)	Inspection	Classification	E-Bike Classification
			Label Examples.doc
6.3.4	Carton Label	Standard	
6.3.4	Carton Laber	Carton Labels	Alta Cycling Standard Carton Lat
	Dockoging	Drop Test	
6.3.5	Packaging Compliance	Protocol	Drop Test Protocols
	Compliance	1100001	- 2021.docx
	Packaging	Drop Test	
6.3.5 (a)	Compliance	New Product	Box Orientation - 10 Drop.doc
	Dark and a	Drop Test	<u> </u>
6.3.5 (b)	Packaging Compliance	Current	Box Orientation - 6
, ,	Compliance	Product	Drop.doc
605/	Documentation	COC / GCC	
6.3.6 (a)	Documentation		ALTA CYCLING GROUP LLC - Generi
6.3.6 (b)	Documentation	СРС	Children's Product
-			Certificate - Generic E

6.3.6 (c)	Documentation	UN 38.3 Example	PDF STL Battery UN38-3 Certificate EBP30A09
6.3.6 (d)	Documentation	UL 2849 Example	UL 2849 CertificateofComplia
6.4.1	Restricted Substances	ACG RSL	Restricted Substance List 11-04-21.docx
6.4.2	Restricted Substances	California Prop 65	Proposition 65 Warnings Website - Your right to know (ca.gov)
6.4.3	Restricted Substances	ME, OR, VT. WA Registration	https://www.maine.gov/dep/safechem/childrens- products/index.htmlhttps://www.maine.gov/dep/safechem/childrens- products/index.html https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=276962 https://app.leg.wa.gov/RCW/dispo.aspx?cite=70.240.020
6.5.1	Legal	CPSC / CPSIA	The Consumer Product Safety Improvement Act (CPSIA) CPSC.gov
6.5.2	Legal	EPAC / E-Bike	In US - See Individual State regulations / European Standard EN 15194 State by State Electric Bike Laws PeopleForBikes
6.5.3	Legal	16 CFR 1500.20	eCFR :: 16 CFR 1500.20 Labeling requirement for advertising toys and games.
6.5.4	Legal	MSDS Forms	Added - MSDS 4 - FAIRLY 36V 10A SEA1