



# Compliance

## Lowe's Undue Influence Policy of Laboratory Test Results

### I. Purpose:

Lowe's is committed to complying with the undue influence requirements of the Consumer Product Safety Improvement Act<sup>1</sup> and the Final Rule on Testing and Certification of Children's Products<sup>2</sup> issued by the Consumer Product Safety Commission. Lowe's prohibits any conduct which may attempt to influence the testing methods or the test results of third party conformity assessment bodies, and thus intends to outline a procedure by which to report any undue influence on this process.

### II. Scope:

The Lowe's Undue Influence Policy of Laboratory Test Results (the "Policy") applies to all Lowe's associates, vendors, suppliers, contractors, and third party agents who are directly involved with evaluating or testing Children's products under prescribed policies as well as mandatory Consumer Product Safety Commission standards.

### III. Guideline and Procedure:

**A. Prohibition on Undue Influence.** Lowe's prohibits and does not tolerate any undue influence of third party conformity assessment bodies. Efforts to influence the testing process or test results of third party conformity assessment bodies are grounds for immediate dismissal or termination of business. Lowe's vendors, suppliers, contractors and third party agents shall comply with all applicable undue influence requirements, and make sure that their every appropriate staff member receive training on avoiding undue influence and sign a statement attesting to participation in such training.

**B. Reporting Channels.** Anyone with any involvement with the testing of products must report conduct that is, or could be, in violation of this Policy to the Compliance Group in Legal Department by phone (1-800-309-5859) or by email (compliance@lowes.com) or to NAVEX Global, an independent third party responsible for fielding compliance-related complaints related to the business conduct of associates and business partners. Complaints submitted to NAVEX Global may be made anonymously. NAVEX Global can be reached through one of the following methods:

Via the Internet: [www.ethicspoint.com](http://www.ethicspoint.com).

Via the Telephone: 800-784-9592 for the U.S. and Canada; 10-800-120-1239 for Southern China; 10-800-712-1239 for Northern China; 800-964214 for Hong Kong; 001-8008407907 or 001-866-737-6850 for Mexico; 00801-13-7956 for Taiwan; 1-800-80-8641 for Malaysia; 001-803-011-3570 or 007-803-011-0160 for Indonesia; 120-11067 for Vietnam; 001-800-12-0665204 for Thailand; 000-800-100-1071 or 000-800-001-6112 for India; 01800-9-155860 for Colombia; 0800-8911667 for Brazil or 503-619-1883 for use internationally.

Lowe's will investigate every reported incident of undue influence promptly, and to the extent possible, in a confidential manner. Lowe's will not tolerate retaliation against anyone for reporting.

**C.** All appropriate personnel are advised that they may provide confidential reports directly to the CPSC:

U.S. Consumer Product Safety Commission  
4330 East West Highway  
Bethesda, MD 20814

<sup>1</sup> 15 U.S.C. 2063.

<sup>2</sup> 16 CFR 1107.24.

# **Lowe's Undue Influence Policy of Laboratory Test Result,**

Continued

301.504.7923 or 800.638.2772  
www.cpsc.gov

## **IV. Training**

- A. Lowe's will train all associates who interact with testing laboratories to make certain no one engages in actions or makes statements that will be considered undue influence. If this Policy is changed substantively, the associates will be retrained and the training materials will be updated as well. All associates who are trained will be required to sign a statement attesting to their training attendance.
- B. The Compliance Group in Legal Department will maintain the record retention, including a copy of this policy, the training materials, and a signed certification from the associate who received the training.