



Date: May 12, 2020

Re: Changes to California's Proposition 65 Regulations

Dear Orgill:

California's Safe Drinking Water and Toxic Enforcement Act of 1986, commonly known as Cal. Prop. 65, is a set of regulations that apply to the sale of products in the state of California that potentially contain toxic chemicals. Cal. Prop. 65 mandates cancer and reproductive harm warnings in association with products that contain at least one of the some 900 chemicals known to the state of California to cause cancer and/or reproductive harm.

Graco is not currently aware of any relevant products containing chemicals in any quantity sufficient to cause cancer or reproductive harm. Graco provides warnings in our product instructions for finished products regarding cancer and reproductive harm out of an abundance of caution and as the simplest approach to compliance with Cal. Prop. 65.

The State of California is changing its Cal. Prop. 65 compliance rules. As of August 30, 2018, warnings are to be made more prominent, and in some cases, inclusion of the warning on product instructions alone may no longer be sufficient for compliance.

The changes to Cal. Prop. 65 regulations allow compliance by utilizing the safe harbor provision of Article 6 § 25603(b) by including a specific warning symbol, the word "WARNING", and the statement "Cancer and Reproductive Harm – www.P65Warnings.ca.gov." on products and/or packaging. This is sometimes referred to as a "short-form warning." A version of the below image will be placed on relevant finished Graco products and/or packaging as a short-form warning:

CALIFORNIA RESIDENTS:  WARNING: Cancer and Reproductive Harm – www.P65Warnings.ca.gov

Article 6 § 25603(c) of Cal. Prop. 65 regulations state that "A person providing short-form warning on the product label pursuant to subsection (b) is not required to include within the text of the warning the name or names of a listed chemical." Graco will not be listing chemicals for Cal. Prop. 65 compliance due to Graco's utilization of this safe harbor provision.

Graco has received your Vendor Agreement regarding Cal. Prop. 65. Consistent with the above strategy, Graco is providing the below check in the document to trigger warning notices, however it is doing so with the understanding that Graco will not be providing chemical, category, or risk listings.

We certify that for all items legal to be sold in California, Prop 65 Warning information will be provided to Orgill, Inc. showing (1) each SKU, (2) whether a Prop 65 warning is required, (3) and the specific warning category, cancer causing and/or reproductive/developmental risk. We agree to submit these items via an electronic file in a format provided by Orgill, Inc. or via Orgill's online portal as directed by Orgill. Further, we agree to provide to Orgill, Inc., via the online portal, any changes, deletions, and additions to this list promptly.

Please let me know if you have any questions about Graco's compliance with Cal. Prop. 65 (psherburne@graco.com).

Sincerely,

Paul Sherburne
Associate General Counsel
Graco Inc.