

CVS Pharmacy California Proposition 65 Clear and Reasonable Warning Policy and Notice to Suppliers

At CVS Pharmacy, we apply robust standards to the production of every product to help ensure the highest level of product quality, safety and compliance with laws. We continuously look for opportunities to meet our customer's evolving desire to use more sustainable materials and chemically friendly products. Whenever possible, we seek to reduce, remove, or reformulate our product selection to use ingredients that are safe, effective and available.

Suppliers are required to meet all federal, state and local laws, regulations and ordinances including California Proposition 65 chemical restrictions and limitations.ⁱ CVS Pharmacy **prohibits** the application of California Proposition 65 in-store signage, on-product warning labels on products, and online product-specific warnings when a safe and effective alternative can be found that provides the same user experience.

Any form of Proposition 65 warning, including on-product Proposition 65 warning labels and online product-specific Proposition 65 warnings, are used with exceptionⁱⁱ. At no time shall CVS Pharmacy receive or accept unsolicited or unapproved California Proposition 65 in-store warning signage or consumer exposure warning labels on product from a Supplier, manufacturer, or distributor.

Our expectation is that our Suppliers know what is in their products; disclose when a Proposition 65 chemical is listed, or otherwise restricted chemical is present, and avoid introducing products to CVS that would require a California Proposition 65 consumer exposure warning label.

Additionally, the California Proposition 65 Regulations require online warnings be provided to California consumers shopping online prior to completion of purchase for products that require Proposition 65 warnings.ⁱⁱⁱ Therefore, if a product requires a Proposition 65 online warning, the Supplier must promptly notify their CVS Pharmacy representative and provide the proposed warning image or the exact warning text.

CVS Pharmacy requires the warning to meet the newly enacted California Proposition 65 Clear and Reasonable Warnings requirements ahead of the August 30, 2018 deadline (<https://www.p65warnings.ca.gov/new-proposition-65-warnings>).

All products sold at CVS Pharmacy stores or online at CVS.com must adhere to these requirements. Please outline your company's compliance status for all active products sold on cvs.com:

- We do not supply products requiring a California Proposition 65 Warning label
- We supply product(s) containing a Proposition 65 Warning label
 - Submit a list of item SKUs **and** a copy of the existing warning image or text to Maureen.Hickey@CVSHealth.com under the subject "Prop 65 Clear & Reasonable". The warning will be reviewed and posted on CVS.com in order to meet the newly enacted California Proposition 65 Clear and Reasonable Warning requirements.

ⁱ An overview of Prop. 65, the Prop. 65 Regulations, and a current list of Prop. 65 listed chemicals can be obtained online at:
<https://www.p65warnings.ca.gov/about/law-regulations>

ⁱⁱ All products requiring a California Prop 65 warning **must** be approved by Omnichannel Merchandising and Quality/Regulatory Compliance before shipping to CVS DCs.

ⁱⁱⁱ See 27 Cal. Code Regs § 25602(b)