



# WD-40 Company

## Product Development Non-Negotiables

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The following lists WD-40 Company's product developmental mandatories. We will abide by these rules as we assemble, develop, or license products around the world.

### **Health and Safety**

WD-40 Company will always consider the safety of its end users as its primary goal in developing or sourcing products. All scientists will follow standard procedures to establishing health, safety and compliance profiles for all existing and new products.

- a. Each formulation considered will be reviewed by industrial health, safety, and compliance experts for product safety. Results will be reported to management for review. A product's safety profile will be reviewed for its appropriateness in its prospective market. Regional health and safety experts will be incorporated for this duty.
- b. Labels: Regional health, safety, and compliance experts will review the formulation and its usage to develop label language that teaches our customers the safest way to use the product with appropriate antidotes for misuse or accidental use. This label language will be reviewed and approved by WD-40 Company's marketing, legal, and R&D departments.
- c. WD-40 Company has a zero tolerance for detectable benzene contamination in its formulations. To achieve this goal, all raw materials with the potential of benzene contamination will be reviewed and tested through common analytical practices.
- d. WD-40 Company will not consider formulations for sale that require warnings against carcinogenicity, reproductive toxins, or germ cell mutagenicity.
- e. For products where normal anticipated use would result in probable release into the aquatic environment (i.e. storm drains), WD-40 Company, in its formulation objective, will exclude environmentally hazardous chemicals above the concentrations that result in the product being classified as Acute Aquatic Toxicity Category 1 and Chronic Aquatic Toxicity Category 1 or 2.
- f. Under the heading of surface safety, each product will be tested for its compatibility on its expected use surfaces.



### **Regulatory Compliance**

Each WD-40 Company formulation will comply with all federal, state and local and/or regional regulatory laws in the market it is sold into. Regulatory management will be conducted according to standard procedures for the administration of regulatory affairs.

- a. Local and regional regulatory laws will be defined by local regulatory consultants. Tribe members from each trading bloc will be assigned to oversee compliance in their region.
- b. Compliance with local and/or regional regulatory laws will not be limited to chemistry, but will govern production, label design, packaging, distribution, and storage.

### **IP Compliance**

Policies and procedures for the development and protection of corporate intellectual property must be observed.

- a. Protection our trade secret formulation and any trade secret classified information in general will be conducted according to standard procedures for the protection of trade secret information.
- b. Each WD-40 Company employee requiring knowledge of our trade secrets to do their job will be required to sign the trade secret non-disclosure agreement. The appropriate distribution of that formulation trade secret will be determined according to the company's trade secret security policy.
- c. Each external partner requiring knowledge of our trade secret formulation to provide a necessary service will be required to sign our trade secret non-disclosure agreement for external partners.
- d. No discussions with suppliers or partners will take place concerning our trade secret concentrate formula until the non-disclosure agreements have been signed.
- e. Developing corporate intellectual property will incorporate patent review of product concepts/prototypes and, when needed, provisional patents, patents, design patents, foreign patents, and complete IP reviews for all licensed prototypes.

### **Product Stability**

No formulation will be introduced to the public without appropriate formulation and packaging stability evaluation completed in accordance with standard procedures.

- a. Stability testing will be required to assure a minimum 2-year plus shelf life for each product.
- b. Required stability evaluations will be determined by formula form (solid, liquid, aerosol, emulsion), formula package (wrapper, box, plastic bottle, aerosol can),



and production method (liquid mix, aerosol fill, solid compaction) according to industry approved and accepted standards and methods.

- c. Any sourced product will need to undergo stability testing unless the company that owns the product has performed stability tests according to industry accepted standards. These methods and results will be reviewed by members of R&D for acceptance.

### **Product Performance and Competitive Claims**

Products will support label claims through accepted laboratory methods and compliance with standard procedures.

- a. The testing methods will be determined by performance goals, consumer usage, and targeted market needs, and selected, when possible, from industry standard methods.
- b. All sales literature claims will be supported through testing.
- c. All competitive claims will be supported through identical test methods performed on each product, in triplicate, run on company test equipment or through the same external laboratory, and when possible, the same operator.
- d. Competitor product tests will be run following the use directions of each tested product.
- e. Every label will be reviewed by R&D, legal, and the appropriate sponsor group (marketing, innovation, legal, etc.) to ensure proper claim support certification is provided and in alignment with claims.