

**Barnes & Noble, Inc.**  
**Vendor and Product Compliance Program Frequently Asked Questions**

**What safety testing is required by Barnes & Noble?**

Barnes & Noble expects suppliers to provide products that meet all applicable and required safety laws, rules, regulations and standards. Suppliers are responsible for knowing all required safety standards for their product and ensuring their product complies with those standards. Suppliers may contract with accredited third-party testing lab to conduct safety testing to ensure that their products comply with all applicable safety requirements. Manufacturers providing proprietary product to Barnes & Noble or any of its subsidiaries must contact the buyer for specific product safety testing requirements.

**We do not produce children's products. Do we still need to submit a Vendor Compliance Certification ("VCC")?**

Yes, you must still provide a VCC. Under the Vendor and Product Compliance Program, Barnes & Noble requires vendors to certify that all products they have or will provide to Barnes & Noble comply or will comply with applicable safety requirements for that product. For example, candles are not children's products but candle suppliers must certify that their products comply or will comply with the specific safety requirements applicable to candles.

**I am a distributor and do not manufacture products supplied to Barnes & Noble. Do I still need to provide a VCC?**

Yes. The VCC addresses product compliance but also addresses other compliance matters. In that connection, distributors must also provide a VCC.

**My products are supplied to Barnes & Noble through a distributor. Which of us is responsible for providing a VCC?**

The vendor of record is responsible for providing a VCC.

**What is the CPSIA?**

The Consumer Product Safety Improvement Act (CPSIA), along with other directives and amendments, enacted new requirements related to lead paint, lead content, phthalates and tracking labels for products designed or intended primarily for children twelve years old or younger ("Children's Products"). For your reference, the U.S. Consumer Product Safety Commission "CPSC") has developed an informational website for the CPSIA, which you can view at <http://www.cpsc.gov/about/cpsia/cpsia.html>.

### **We only supply/manufacture ordinary books. Do I still need a Product Certification?**

No. The CPSC has confirmed that ordinary reading books manufactured with traditional printing materials are excluded from CPSIA testing requirements. Therefore, no Product Certification is required for ordinary books.

### **I do not think my product requires a Tracking Label.**

The CPSIA specifically mandates that all Children's Products contain requisite tracking labels, and if you supply any Children's Products to us, such products must meet these requirements. Suppliers are responsible for including all required information on the tracking labels for their product. Click here for more information on the CPSIA requirements on tracking labels.

<http://www.cpsc.gov/about/cpsia/sect103.html>.

### **What are the CPSIA lead and phthalate limits?**

Please click on the link below for the text of the legislation, summaries of relevant provisions and FAQs regarding Children's Products Containing Lead; Lead Paint Rule; Products Containing Certain Phthalates, Mandatory Third Party Testing for Certain Children's Products; Tracking Labels for Children's Products; etc.: <http://www.cpsc.gov/about/cpsia/legislation.html>.

### **How do I find an accredited third party testing lab?**

A list of accredited third party testing labs can be found on the CPSC website:

<http://www.cpsc.gov/cgi-bin/labapplist.aspx>

## **Conflict Minerals Frequently Asked Questions**

### **What is the Conflict Minerals Rule?**

The Conflict Minerals Rule refers to Section 1502 of the Dodd Frank Wall Street Reform Act. Section 1502 was prompted by concern that the trade of certain minerals is funding conflict in the Democratic Republic of Congo region. The provision's intent is to curb the violence by limiting the flow of funds to militia groups by requiring SEC-registered companies to disclose of the source of these minerals used within their supply chains.

### **Which minerals are considered conflict minerals, or "3TG"?**

- Tin – from ore Cassiterite
- Tantalum – from ore Columbite-tantalite (Coltan)
- Tungsten– from ore Wolframite
- Gold

### **Which countries are included in the “Conflicted Areas”?**

The SEC states that any country bordering the Democratic Republic of Congo (“DRC”) or the DRC itself is considered a conflicted area. These countries include Angola, Burundi, Central African Republic, Democratic Republic of Congo, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia. Under the Conflict Minerals Rule, the Secretary of State can add more countries to this list in the future.

### **I am aware of conflict minerals legislation, but I am unsure of Barnes & Noble’s explicit requirements for my company. What are these expectations?**

Barnes & Noble is turning to its tier one supply base to answer questions about the products and parts provided. Barnes & Noble requests that its suppliers assist in Barnes & Noble’s Reasonable Country of Origin Inquiry (RCOI) by responding via the EICC – GeSI Template (or subsequent survey provided by Barnes & Noble) promptly, thoughtfully, honestly and to the best of the supplier’s knowledge.

Barnes & Noble suppliers are responsible for performing their own supply chain due diligence.

Please see also our Vendor Code of Conduct, which can be found on [http://www.barnesandnobleinc.com/vendor\\_requirements](http://www.barnesandnobleinc.com/vendor_requirements).

### **Is there a standard guidance for becoming compliant?**

The SEC’s Final Rule requires issuers to “use a nationally or internationally recognized due diligence framework in connection with its Conflict Minerals Report<sup>1</sup>” Currently, the only nationally or internationally recognized framework is the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas published by the Organisation for Economic Co-operation and Development (“OECD”)<sup>2</sup>.

This is the framework that B&N is using to become compliant with conflict minerals and is the guidance that B&N recommends that its suppliers follow to achieve compliance as well.

### **Does B&N have a team that I can contact with specific questions?**

Yes, B&N’s conflict minerals team can be contacted at [conflictminerals@bn.com](mailto:conflictminerals@bn.com). Additionally, we have posted B&N’s Conflict Minerals statement on [http://www.barnesandnobleinc.com/vendor\\_requirements](http://www.barnesandnobleinc.com/vendor_requirements).

---

<sup>1</sup> SEC Conflict Minerals Final Rule Page 27

<sup>2</sup> SEC Conflict Minerals Final Rule Page 28

**Is there a “de minimis” or minimum threshold to report 3TG?**

There is currently no "de minimis" threshold or minimum percentage which triggers the supply chain analysis on conflict minerals. Regardless of the amount of conflict minerals in your company's supply chain, our process requires that we collect a response from all suppliers.

**I do not manufacture any of the items I sell, my subcontractors do. Do I need to report?**

If the product you sell to Barnes & Noble is contracted for manufacture by Barnes & Noble, the Conflict Minerals Rule applies to the product you supply to us. However, in order to meet our compliance requirements, Barnes & Noble is asking its supply base to communicate with sub-suppliers to ascertain the existence of conflict minerals within your supply chain.

**Who can I contact with questions about your product compliance requirements?**

You may email [compliance@bn.com](mailto:compliance@bn.com).

**I am unable to send a PDF of the completed and signed form? How should I send this form to you?**

You may fax your signed forms to 212-727-4828. You may also mail your signed forms to: Barnes & Noble, Inc., 122 Fifth Ave., NY, NY 10011 Attn: Product Compliance Department