TARGET’S NEEDLE & METAL CONTAMINATION POLICY AND PROCEDURE
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Overview
Target’s policy and procedure is as follows:
Needle and Metal Contamination Policy: The regulation put in place to ensure products which are manufactured and sold in the US market are free of any broken needle or metal parts which could cause an injury to a Target guest.
Broken Needle Control Log and Metal Detection Procedure: Is the implementation of guidelines and rules to be followed to ensure the Policy is achieved. This is backed up with documentation and regular checks at the factory level.

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Objective
• Understand Target’s Needle and Metal Contamination Policy and Procedure
1. Needle and Metal Contamination Policy

- Target’s Needle and Metal Contamination Policy ensures that products sold in the US market are free of any broken needle or unwanted sharp metal parts. Target will only work with Vendors/Factories compliant with our policy.

- Target’s Needle and Metal Contamination Policy is divided into two phases:
  - Prevention- Broken Needle Control Log procedure. Applies to all factories producing Target products where needle operations are involved.
  - Detection - Needle/Metal Detector in all factories producing Children’s and Softhome products without metal trims. Target recommends all factories use Metal detection equipment, where applicable.

- If products are discovered contaminated after they have been sold this could cause an injury to a Target guest and would result in the following for both Vendor and Target:
  - Bad publicity
  - Legal action
  - Product Recall
  - Financial loss

- Due to the manufacturing techniques and equipment used the following items are a risk factor for our Target guests:
  - Broken Sewing Needles
  - Broken Knitting Needles
  - Pins
  - Staples
  - Wires
  - Scissors (Scissor tips)
  - Other Stray Metals
  - Razor blades
2. Prevention

Broken Needle Log Control Procedure

Every factory that uses any type of needle operation, regardless of product, is required to comply with the Broken Needle Control Log procedure. The Broken Needle Control Log should include:
- Date/Time of Incident
- Production Line
- Operation
- Operator
- Machine Type/Machine ID
- Mount Broken Needle
- Panel/Garment Destroyed – Yes or No
- Mechanic’s signature and Date

Example: Sample Broken Needle Control Log

<table>
<thead>
<tr>
<th>D/A/1M OF INCIDENT</th>
<th>PRODUCTION LINE</th>
<th>OPERATION</th>
<th>OPERATOR</th>
<th>MACHINE TYPE/ID</th>
<th>MOUNT BROKEN NEEDLE</th>
<th>PANEL/ GARMENT DESTROYED</th>
<th>MECHANIC'S SIGNATURE AND DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

Example: Completed Broken Needle Control Log

- Maintain a controlled needle inventory system and a broken needle control log.
- This log should include all broken parts or damaged needles along with any corrective action taken.
• Each sewing machine should have an ID (identification number).

• Needle replacement should be done only by designated factory personnel (e.g. inline supervisor, mechanic, needle log supervisor, etc.) to provide a log recording all parts of a broken needle have been accounted for.

   Note: Sewing operator should not have free access to spare needles.

• Production work areas are to be kept clear of unnecessary sharps (e.g. scissors, razor blades, staples, pins and loose metal parts).
• Machines and/or operators which continue to have broken needle issues should be reviewed and appropriate corrective action taken.
• Machines and their surrounding areas should be checked daily for needle and/or metal contamination.

For products where a needle/metal detector is mandatory
• In the event of a needle breaking during any sewing operation, the panel or product piece being sewn should be retrieved from the production line and checked for broken parts.
• Broken parts should be sealed on the broken needle log control sheet indicating all details listed above.
• If all broken parts are not accounted for, contaminated panels or product pieces should be passed through the needle detector. If the needle detector still detects metal parts and if after further investigation, the pieces cannot be found, the panel or product pieces should be destroyed and recorded on the log.
For products where a needle/metal detector is not mandatory

- In the event of a needle breaking during any sewing operation, the panel or product piece being sewn should be retrieved from the production line and checked for broken parts.
- Broken parts should be sealed on the broken needle log control sheet indicating all details listed above.
- If all broken parts are not accounted for, contaminated panels or product pieces should be destroyed and recorded on the log.

- During Factory Evaluations, TCPS MT’s will check the following to ensure factory is compliant with the Target’s Needle and Metal Contamination Policy:
  - Needle Inventory System
  - Broken Needle control log for accuracy and integrity of the records.
  - Sewing machines have ID number and are verified against the Needle Inventory System and Broken Needle control log.
  - Check machine oil sump for any broken parts and surroundings for loose metal parts.
  - Check that sewing operator does not have access to needles and unnecessary sharps by verifying machine surrounding and drawers.

**Note:** Factories found to be non-compliant with Target’s Needle and Metal Contamination Policy will be placed on hold for corrective action.

3. Detection

**Needle/Metal Detector**

- All factories producing Children’s and Softhome products MUST have an appropriate number of Needle/Metal Detectors, so as not to cause bottle necks at the point of needle detection and to ensure all productions passes through the needle detector.
- The Needle Detector should be placed in a controlled area to ensure there is a clear delineation of the product that has passed through the needle detector, and those which have not.
  - The controlled needle detection area should be established so that no finished product can move to the packing/finishing area without being passed thru the needle detector in advance.

**Note:** Do not permit any metallic tools or fixtures in this area or on the person operating the machine. Keep all unnecessary metal away from this area.
All applicable units must pass thru the Metal Detector before the Packing phase (in other words – sales ready)

- The Needle Detector must work at a minimum sensitivity level of 1.2mm diameter.
  - A 9 point calibration procedure must take place a minimum of two times a day. Target recommends higher frequency of checks with higher production levels.
  - Target recommends Enclosed-Head Detection which ensures that this sensitivity is guaranteed at every point.
  - Tunnel or plate detectors do not guarantee total coverage due to blind spots

- It is factory's responsibility to contact their detector supplier and obtain the appropriate equipment to be compliant to Target requirements.

- Vendors are recommended to use trim/components that are non-ferrous and nickel free or with finish suitable for needle/metal detectors.
  - Examples of Compatible (non-ferrous) Metals are Brass, Bronze Copper and Aluminium.
  - Examples of Non-Compatible (ferrous) Metals are: Steel, iron, cobalt and nickel-plated.

- Vendor/Factory should state, at time of purchase, that items need to be suitable to pass through needle/metal detection equipment.

- Units should be placed on the automated conveyor belt allowing it to pass through the detector head without manipulation.
  - Detector should be calibrated by supervisor only
  - Never force the product through the detector head
  - Product must pass through detector without operator assistance
  - Records of production detected must be kept available for TCPS to review (style-quantity/date/hour-operator-supervisor-contamination)
**Best Practice:** Product passed through the detection equipment should be held in a separate holding area, until it has been established that the next calibration test has passed (should there be an issue between calibration tests, allows for easy rechecking of product)

- Contaminated goods (rejected) should be kept in a separate area, making sure potentially contaminated products do not get mixed with the accepted items.

- When any form of metal has been detected:
  - Check for metal part using the hand held detector, if available, to identify location of metal part within product.
  - If found:
    - Remove Metal and re-detect product to make sure all contamination has been removed.
    - Log and advise supervisor for decision to keep for records or return to department/owner.
    - Identify Root Cause and take corrective action. Document the process implemented.
  - If NOT found:
    - Call supervisor
    - Destroy product
    - Identify root cause and take corrective action
    - Document and implement the process

**Exception for Softhome**

- Items such as area rugs or carpets that cannot be passed through the metal detector tunnel due to width or height are to be scanned with hand held equipment with a planned and documented sequence to ensure full coverage of item

*Note: Target recommends the use of a bulk detector for large items instead of hand equipment.*
4. 9 Point Calibration Process

- The 9 Point calibration ensures that the equipment is functioning correctly and operating at the correct sensitivity (1.2mm).
- The 9 Point calibration must be done a minimum of 2 times per shift by supervisor.
- Reports must be available for TCPS to review at anytime

**Best Practice**: Target recommends doing the 9 Point Calibration test every hour.

**Process**
1. The 9 Point Calibration check on the detector is done by dividing the metal detector conveyor belt in 3 zones.

   *Example*: Zones A, B, C

2. The Calibration Card, supplied by machine vendor, is passed through each of these zones at three different height levels.
   - Factories must have an approved ferrous Calibration Card from equipment manufacturer
   - Hand made calibration cards are NOT acceptable

3. The Detector sensitivity must be set at a level which is less than 1.2mm sphere to detect the Calibration Card.

4. The Calibration Card is placed on the conveyor belt and passed through each zone – A, B and C. Readings are recorded on a 9 Point Calibration Report.
• The 9 Point Calibration Report should be marked as follows
  o **Y** - if the needle detection activates (alarm sounds, light activates and machine stops) when the 1.2mm Ferrous Calibration Card is passed through the search head.
  o **N** - if the needle detector has no reaction (no alarm sound/light) when the 1.2mm Ferrous Calibration Card is passed through the search head.

• If there is no reaction during the 9 point Calibration procedure the operator must stop the machine and call the supervisor. All production must be placed on hold since last acceptable 9 Point Calibration Report record.
• If repairs are needed, call for a qualified technician responsible for the Needle/Mechanical detection equipment and after repair do a new 9 point Calibration test for verification.

### Example: 9 Point Calibration Report

<table>
<thead>
<tr>
<th>9 POINT CALIBRATION REPORT</th>
<th>SUPERVISOR</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>DATE</strong></td>
<td><strong>TIME</strong></td>
</tr>
<tr>
<td>01.01.08</td>
<td>07.30 AM</td>
</tr>
<tr>
<td>01.01.08</td>
<td>08.30 AM</td>
</tr>
<tr>
<td>01.01.08</td>
<td>09.30 AM</td>
</tr>
<tr>
<td>01.01.08</td>
<td>10.30 AM</td>
</tr>
</tbody>
</table>

**Note:** When conducting the calibration test you must use only the calibration card and card holder, no paper or products are allowed to be put through the metal detector.

5. The card is to be placed in the center slot of the holder (1 1/2” in height) and passed through each zone – A, B and C. Readings are recorded on a 9 Point Calibration Report.

6. The card is then placed at the top slot of the holder (3” in height) and passed through each zone – A, B and C. Readings are recorded on a 9 Point Calibration Report.
During the Factory Evaluation Process, it is the TCPS Manufacturing Technicians (MT) responsibility to ensure that factories producing Children’s and Sofhome products have:

- Appropriate number of Metal/Needle Detectors for Target’s production.
- Metal/needle detectors are installed before packing area and there is a clear delineation from detected and non detected goods.
- A 9 point calibration procedure is in place with daily records showing that calibration procedure is in use.
- Records of production lots that have passed through the machine.

**Note: Factories non-compliant with Target’s Needle and Metal Contamination Policy will be placed on hold for corrective action**

During Placement and Pre Production Meetings

- TCPS must determine if product with trims and embellishments can be passed through the needle/metal detector equipment without detection.
- In the event of non-compatible trims, TCPS will immediately alert their supervisor and Local MR that product is exempt from needle detection screening.
- TCPS (MT or Inspector) will test approved red/yellow seal samples through factories metal/needle detector.

After completing a Product Inspection TCPS may decide to pass products inspected through the Needle/Metal detector and record results.

- There is a Zero tolerance when finding product with metal contamination during inspections. Inspections will automatically FAIL if:
  - 1 contaminated unit is found
  - If missing detection records
- During Inspections, TCPS will check the 9 Point Calibration records and that Target’s requirements have been followed.

**Note: Failure to comply with Target’s requirements will result in shipments being put on hold until all products can be processed through a detector.**