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To: All Employees,  
Distributors, Agents and Applicators

May 26, 2020

RE: EPA COMPLIANCE GUIDANCE MEMO

In a recent event one of our clients had inadvertently published an internal document of how Goldshield (5/75) was effective in killing Covid19, when they should have referred to the disinfectant that was being used that can make claims against viral pathogens. That statement was made by error, and it has to be corrected. That document was some how released to the press, implying that we, AP Goldshield LLC, were making un-registered claims on GS 5/75 against this virus, which is not true. I, therefore, feel it is critical to reiterate our position on compliance with all claims we are and are not permitted to make with GS 5/75. Please provide this to all your agents, distributors, and Certified applicators. Making false or inaccurate claims places these entities and our company in jeopardy of fines or other recourse by the EPA.

Goldshield is fully aligned and compliant with EPA's position re: COVID-19. Goldshield has a product listed on the EPA-CDC listing, which states as follows: "*Goldshield 34, EPA # 6836-340-85556 wet wipes, has demonstrated effectiveness against viruses similar to 2019 Novel Coronavirus (2019-nCoV) on hard, non-porous surfaces. Therefore, Goldshield 34 wet wipes can be used against 2019 Novel Coronavirus (2019-nCoV) when used in accordance with the directions for use against Norovirus on hard, non—porous surfaces. Refer to the CDC website <https://www.cdc.gov/coronavirus/2019-ncov/index.html> for additional information.*"

That product is the only Goldshield product making such viral claims.

In the USA on our core antimicrobial(s), Goldshield 5 (5% concentrate) and its ready to use version, Goldshield 75 (0.75%), we specifically state that we have not been approved for any viral claims and more specifically can make no claims against Covid 19 or for that matter any

viruses. Our residual claim is for bacteria and fungi that can cause odor, staining and discoloration such as mold(s). This is a 90-day residual claim or when these organisms re-appear that would require re-application. In Europe and in Asia we do make viral claims as their testing protocols are different than in the USA and the core antimicrobials in those Nations are classified as biocides. This Memo is strictly directed at all USA affiliates.

If a client or end user has unintentionally made any claims of efficacy regarding Covid 19 or and other virus based on our core technology, not GS 34, within the USA we and you will notify them to cease such language and abide by our mandates to remain compliant with EPA registrations and our Master label claims.

As a result of this press inquiry we wanted to reinforce our position by issuing this Guidance Memorandum. This guidance memo will update our position to ensure compliance in light of this press inquiry, and these updated guidelines are being communicated to all distributors and applicators this week. We are very sensitive to these issues with multiple correspondences via emails and other papers where we clearly state our compliant position on all products of the claims we are permitted to make within the USA.

**Goldshield** is committed to regulatory compliance, consistent with the company's mission to be a trusted source of safe, alcohol-free products for consumers and will continue to work with our distributors and applicators to ensure appropriate guidelines are followed. We look forward to fully and expeditiously resolving any misunderstanding on our compliance position so all employees, distributors, agents and applicators are fully aware and informed on what claims we can and cannot state.

Sincerely,

*Thomas L. Higgins*

Thomas L. Higgins

CEO