

INEOS Olefins & Polymers USA ("INEOS") RESPONDS TO PRODUCT STEWARDSHIPS REQUESTS WITH A STANDARDIZED REGULATORY POSITION STATEMENT (RPS) WHICH SUMMARIZES THE REGULATORY STATUS OF THE ABOVE-MENTIONED PRODUCT FOR SPECIFIED JURISDICTIONS. PLEASE NOTE THAT COMPLIANCE WITH THESE REGULATIONS SHOULD NOT BE INTERPRETED TO GUARANTEE THE PERFORMANCE OF THE PRODUCT IN A PARTICULAR APPLICATION. YOUR TECHNICAL SERVICE REPRESENTATIVE CAN HELP YOU DETERMINE THAT THE CHARACTERISTICS OF THE PRODUCT ARE COMPATIBLE WITH THE DESIRED CONDITIONS OF USE.

Food Contact Regulations

INEOS makes the following statements regarding the compliance status of the product referenced above ("Product") with the regulation(s) identified below, as applicable to plastic intermediate materials:

United States FDA Compliance - Title 21 Code of Federal Regulations (CFR)

rPP-H03-301G, as manufactured ("Product"), is in compliance with Title 21 Code of Federal Regulations (CFR) Section §177.1520(c) item 1.1(a). All components used in the manufacture of the Product are cleared for use in 21 CFR §170-189 on the basis of specific citation, generally recognized as safe (GRAS), prior sanctioned, under a specific Food Contact Notification (FCN), or No Objection Letter (NOL). The Product is cleared for use with all types of food and limited to the conditions of use as follows:

Articles consisting of up to 60% recycled content for contact with all *Types of Food* under Table 1, and *Conditions of Use B* through *H* under Table 2, respectively, as found on the FDA website at <https://www.fda.gov/food/packaging-food-contact-substances-fcs/food-types-conditions-use-food-contact-substances> as described in 21 CFR §176.170(c).

Health Canada, Health Products and Food Branch "No Objection" Letter

Letters of No Objection (LONO) are available for components of this Product. Based on the information submitted and on the understanding that the temperature conditions for use of the Product does not exceed 48.9 °C (120°F), there is no reason to object, in principle, to the use of the resin in food contact applications, limited as above to FDA *Conditions of Use B* through *H*, provided it is technically suitable for the intended use.

Halal, Kosher Status

This grade has not received Halal or Kosher certification. However, we can hereby confirm that no ethanol, animal fats, oils, milk products or other animal- or tallow-derived products are intentionally used as components of, or in the manufacture of, this product.

Allergens

None of the substances listed as causing allergies or intolerances in the following legislations or standards are intentionally added to this grade or expected to be present:

- Food Allergen Labelling and Consumer Protection Act of 2004 (FALCPA)

Allergens and/or their derivatives from such things as pigments, artificial sweeteners (e.g. aspartame), almonds, Brazil nuts, cashews, colophony, corn, hazelnuts, macadamia nuts, pecans, pine nuts, pistachios and walnuts; peanuts, lupine, soy/soybeans, peas, carmine/cochineal, milk, lecithin, eggs, fish, shellfish/crustacea or molluscs, diacetyl, tree nuts, celery, sesame seeds, mustard or mustard seeds, glutamites, glutamic acid, MSG or hydrolysed vegetable proteins, nitrites or sulfites, or gluten from the grains of the following cereals: barley; oats; rye; triticale; or wheat.

Genetically Modified Organisms (GMO)

Because of the multitude of crop sources used, our suppliers of plant-based additives are unable to certify that their products are 100% GMO-free.

It is the responsibility of the food producer to determine the suitability of the Product for the end use and to ensure the legal and regulatory compliance of the Product as incorporated into articles intended for food contact. It is the responsibility of the manufacturer of the particular article for which the end use in its finished state is intended for food contact applications to determine the suitability of the Product as a component of such end-use article and to ensure the legal and regulatory compliance of the Product as incorporated into such end-use article, including SMLs, QM and other restrictions or limits under the applicable laws and regulations.

Global Inventory Status

The base polymers of the Product are a virgin PP homopolymer and mechanically recycled HPDE/PP blend. Any hazardous constituents above regulatory disclosure cut-off limits determined according to their regional and/or specific GHS classification(s) will appear in the ingredients section of the SDS for the Product.

Country	Inventory	Status
United States of America	EPA Toxic Substance Control Act: TSCA – Active Substance List	Y
Canada	Domestic Substances List: DSL or Non-Domestic Substance List: NDSL	Y

Other Regulations

This product is in compliance with the relevant requirements of the following regulations:

CA Prop 65 - Safe Drinking Water and Toxic Enforcement Act of 1986, as amended.

No substance listed on California’s Proposition 65 chemicals listing, known to the State of California to cause cancer or reproductive toxicity, is intentionally added in the manufacture of this product. It remains the responsibility of the final article’s producer to ensure compliance and reporting according to California Proposition 65 requirements.

Metals

US CONEG – “Toxics in Packaging Clearinghouse”

The regulated metals – lead, mercury, cadmium, and hexavalent chromium – are not intentionally added during the manufacturing process. Testing for heavy metals – cadmium, chromium, lead and mercury – resulted in a total for all metals detected of < 100 ppm.

Substances of Concern to Our Customers

Based on knowledge of our raw materials and information from our suppliers, we can state that none of the substances of concern to our customers listed in the table below are intentionally added to this product.

We do not conduct routine analytical testing for the presence of these substances in our products and we cannot guarantee that there are no trace amounts of these substances, as impurity or otherwise, in this product.

Absence of Substances and Chemicals	
▪ 1,4-Dioxane	▪ Asbestos
▪ 3-MCPD (3-monochloropropane)	▪ Azo dyes/ Colorants/Pigments
▪ Acrylamide	▪ Azodicarbonamide or semi-carbazide compounds
▪ Alkylphenols and Ethoxylates: Octylphenol and Nonylphenol ethoxylates	▪ Benzophenones, hydroxybenzophenone and 4-methyl benzophenone
▪ Allergens or allergen derivatives	▪ Benzoate Preservatives (e.g., BHA, BHT, TBHQ)
▪ Animal or Human Derived Material/TSE/BSE ¹	▪ Bisphenols (e.g., A, AF, AP, B, BP, C, E, F, FL, G, M, P, PH, S, TMC, Z)
▪ Antimicrobial agents/ Biocides/ Fungicides/ Pesticides (<i>Substances identified as such and used for such purpose</i>) ²	▪ Bromine or Bromine Compounds
▪ Aromatic Amines	▪ Carboxymethylcellulose
▪ 2-mercaptobenzothiazole	▪ Carcinogenic, mutagenic, or reprotoxic (CMR) substances

Absence of Substances and Chemicals

<ul style="list-style-type: none"> Chlorinated paraffins (Short Chain (SCCPs), Medium Chain (MCCPs), and Long Chain (LCCPs)) 	<ul style="list-style-type: none"> Heavy Metals (e.g., As, Ba, Cd, Cr, Hg, Ni, Pb, Sb, Se)
<ul style="list-style-type: none"> Chlorine or Chlorinated Compounds 	<ul style="list-style-type: none"> International Council for Harmonisation (ICH) Q3D Elemental Impurities
<ul style="list-style-type: none"> Chlorofluorocarbons (CFC), hydrochlorofluorocarbons (HCFC), hydrofluorocarbons (HFC) 	<ul style="list-style-type: none"> “Intelligent packaging” materials
<ul style="list-style-type: none"> CITES Appendix (I, II, III) 	<ul style="list-style-type: none"> IUCN Red List of Threatened Species
<ul style="list-style-type: none"> Cobalt or Cobalt Compounds 	<ul style="list-style-type: none"> Jatropha Oil
<ul style="list-style-type: none"> Cocamide diethanolamide 	<ul style="list-style-type: none"> Latex or Natural Rubber
<ul style="list-style-type: none"> Conflict Minerals: columbite-tantalite, coltan, niobium, tantalum, cassiterite (tin), gold, and wolframite (tungsten)³ 	<ul style="list-style-type: none"> Melamine and cyanuric acid
<ul style="list-style-type: none"> Decabromodiphenyl ether (Deca) 	<ul style="list-style-type: none"> Methylisothiazolinone (MI / MIT) & Methylchlorisothiazolinone (MCI / CMIT)
<ul style="list-style-type: none"> Diethanolamine salts of mono- and bis 	<ul style="list-style-type: none"> Microbeads
<ul style="list-style-type: none"> Dimethyl Fumarate (DMF) 	<ul style="list-style-type: none"> Mineral Oils – MOAH or MOSH⁴
<ul style="list-style-type: none"> Dioxins and furans 	<ul style="list-style-type: none"> Nanoparticles
<ul style="list-style-type: none"> Endocrine Disruptors⁵ 	<ul style="list-style-type: none"> N-Ethyl-toluenesulfonamide (Ortho/Para)
<ul style="list-style-type: none"> Epoxidized Soybean Oil (ESBO) 	<ul style="list-style-type: none"> Nickel or Nickel compounds
<ul style="list-style-type: none"> Flame Retardants (e.g., Brominated, Halogenated, Phosphorous- or Nitrogen-based, Chlorinated, etc.) 	<ul style="list-style-type: none"> Nitrates
<ul style="list-style-type: none"> Formaldehyde 	<ul style="list-style-type: none"> Nitrocellulose
<ul style="list-style-type: none"> Fragrances 	<ul style="list-style-type: none"> Nitrosamines
<ul style="list-style-type: none"> GADSL, “Global Automotive Declarable Substance List,” as amended, listed as Declarable or Prohibited above 0.1% wt. 	<ul style="list-style-type: none"> Organotin Compounds, such as tributyl tin, trimethyl tin oxide, triphenyl tin, and trialkyl tin
<ul style="list-style-type: none"> Halogens (e.g., fluorine, chlorine, bromine, iodine, astatine) or Halogenated Compounds containing these elements 	<ul style="list-style-type: none"> Ozone Depleting Chemicals (ODCs)⁶
<ul style="list-style-type: none"> Hazardous Air Pollutants (HAPs) Section 112(b) of the US Clean Air Act 	<ul style="list-style-type: none"> Polycyclic Aromatic Hydrocarbons (PAHs)

Absence of Substances and Chemicals	
▪ Parabens	▪ Red List (Living Future Bldg. Materials List)
▪ Pentanoic acid	▪ Radioactive Substances
▪ Perchlorates	▪ REACH SVHC, Annexes XIV and XVII
▪ Perfluoroalkyl substituted phosphate ester acids	▪ Silica
▪ Per- and Polyfluorinated compounds (PFAS), including their acid, salts and pre-cursors such as PFCs, PFAs and PFASs, PFNs, PFOs and PFOA and PFCAs ⁷	▪ Silicone
▪ Persistent, Bioaccumulative, and Toxic (PBT) Chemicals Under EPA TSCA Section 6(h)	▪ Solvents
▪ Persistent Organic Pollutants (POPs) as listed in Regulation (EU) 2019/1021 Annex I-IV, including all amendments up to (EU) 2021/277, amending EC No 850/2004 & Annexes A, B, & C of Stockholm Convention	▪ State Lists (e.g., Chemicals of Concern, including Maine, Massachusetts, Minnesota, Oregon, Vermont, Washington)
▪ Phthalates (e.g., BBP, BDP, DBP, DCP, DEHP, DEP, DiBP, DiDP, DiNP, DMP, DnHP, DnOP, DiiHP) ⁸	▪ Styrene
▪ Photoinitiators (e.g., 2-Isopropylthioxantone (ITX))	▪ Thiuram Mix
▪ Polysorbate 80	▪ Titanium Acetyl Acetonate (TAA)
▪ Polybrominated compounds (e.g., PBBs, PBDEs, and PBTs)	▪ Titanium Dioxide
▪ Polyhalogenated Organo Compounds (e.g., PCBs, PCTs, PCNs, and Ugilec)	▪ Triclosan (2,4,4' –trichloro-2'-hydroxy-diphenyl ether)
▪ Primary Aromatic Amines (PAAs)	▪ Tris (Nonylphenyl) phosphite (TNPP)
▪ Plasticizers	▪ Vinyl chloride monomer (VCM) and its polymers or copolymers (PVC, PVDC)

Product Stewardship Compliance Statement

1) It is customer's responsibility to verify the suitability of INEOS's Product for the intended use, to obtain the necessary competent government approvals, and to ensure compliance with any applicable legal and regulatory requirements. INEOS does not warrant the suitability of its Products for any intended use, whether by its customers, or in connection with any end-use articles incorporating the Product. Furthermore, customer acknowledges and accepts its responsibility to determine and perform all necessary tests on its articles incorporating the Product to ensure that all conditions, specifications, and legal and

regulatory requirements are satisfied and that its finished products manufactured with this Product are suitable for the application intended, including, but not limited to, medical, pharmaceutical, food packaging, food contact, as applicable.

- 2) The customer assumes all risks and liability to its downstream customers and consumers and purchasers.
- 3) If the customer distributes, resells, or otherwise makes the Product available to third parties, customer will be solely responsible to provide notice of the disclaimers in this document to such third parties, and customer assumes all risks and liabilities for failing to provide such notice to such third parties.
- 4) The information provided is of the date hereof and INEOS may update, revise, or amend the information contained herein whenever possible at any time. Purchaser shall verify any updates to this information by contacting INEOS's Product Stewardship Department.

As agent for INEOS USA,



The information contained herein relates only to the specific Product identified herein and is not valid for any combination of such Product with any other product and/or material or for any use of such Product in any process. The information in this document does not in any way modify, amend, enlarge, or create any specification or warranty, and ALL WARRANTIES, EXPRESS OR IMPLIED, INCLUDING WITHOUT LIMITATION THE WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE, ARE HEREBY EXCLUDED. The representations herein expressed are neither intended nor shall be construed as a definitive or comprehensive statement of the regulatory compliance of the Product. INEOS will not be responsible for any damage or injury resulting from abnormal use, from any failure to follow appropriate practices, or from hazards inherent in the nature of the Product, nor for toxicological effects or Industrial Hygiene associated with particular use of the Product. Recipient hereby acknowledges and accepts its sole responsibility to determine and ensure that all conditions, specifications, and regulatory requirements are met and that the articles fabricated from the Product are acceptable for use in the intended application.

¹ No animal fats, oils, milk products or other animal- or tallow-derived products are used as components of, or in the manufacture of, this product.

² Biocidal Products (as defined in art.3 of Regulation (EU) No 528/2012 of 22 May 2012 as amended, specifically as any substance or mixture, in the form in which it is supplied to the user, consisting of, containing, or generating one or more active substances, with the intention of destroying, deterring, rendering harmless, preventing the action of, or otherwise exerting a controlling effect on, any harmful organism by any means other than mere physical or mechanical action") are not used in the manufacture of or formulation of this product. The above product is not listed in the Annex "Active Substances Approved for Use in Plant Protection Products (i.e., fungicides, insecticides, plant growth regulators, rooting hormones, preserving plant products, herbicides, weed killers ...) of the Commission Regulation No 540/2011 implementing Regulation (EC) No 1107/2009 as regards the list of approved active substances - Amendments - Commission implementing Regulation (EU) 2018/1915 of 6 December 2018.

³ INEOS O&P USA (INEOS O&P) is not a publicly traded company so is not subject to the SEC reporting requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

⁴ Mineral Oils are not intentionally used as raw materials or additives in the manufacture of this grade. MOSH (Mineral Oil Saturated Hydrocarbons) and MOAH (Mineral Oil Aromatic Hydrocarbons) are not intentionally added as raw materials or additives. MOAH are not expected to be present. However, we cannot confirm the absence of MOSH as they represent a chromatographic fraction of hydrocarbons which could come from other sources, including but not exclusively oligomers, also known as POSH (Polyolefin Oligomeric Saturated Hydrocarbons). POSH are an intrinsic part of polyolefins and the result of the polymerization process. They can present hydrocarbon fractions similar to MOSH depending on the analytical technique used. It has been demonstrated that consumer exposure to oligomers from polyolefins food packaging under typical conditions of use is not a safety concern to human health.

⁵ None of the substances intentionally used in the manufacture of this grade are listed as having Endocrine Disrupting properties under Lists I, II and III of Endocrine Disruptors List on <https://edlists.org/the-ed-lists> and under the Candidate List of substances of very high concern for Authorisation as published under REACH Regulation (EC) 1907/2006.

⁶ Materials listed in the Clean Air Act Amendments of 1990 (Class I, CFCs and Class II, HCFCs, Halons and the solvents, carbon tetrachloride and 1,1,1-trichloroethane) and ozone-depleting substances (ODS), listed in the Annexes I & II of the Regulation (EU) 2024/590 of 7 February 2024, are not intentionally used in the production of this product.

⁷ PFAS as defined by OECD (2021), Reconciling Terminology of the Universe of Per- and Polyfluoroalkyl Substances: Recommendations and Practical Guidance, OECD Series on Risk Management, No. 61, OECD Publishing, Paris.

⁸ As with most polypropylene grades, including grades from other producers, this resin may contain trace levels of phthalates. If needed, please contact INEOS for further information.

Contact us:

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