

## Product Regulatory Statement

**Effective date:** 1st September 2019

### Turkish chemical regulations compliance

Dear valued customer,

The following information is provided to you in response to your inquiry regarding whether products from INEOS Composites and its subsidiaries, sold to Turkish market, are compliance with Turkish Chemical Regulations as described below:

- By-law on the Classification, Labelling and Packaging of Substances and Mixtures (11.12.2013/28848) (SEA).
- The Turkish regulation on Registration, Evaluation, Authorisation and Restriction on Chemicals (23.06.2017/30105 (Bis)) (KKDIK).
- By-law on the Safety Data Sheets for Hazardous Substances and Mixtures (13.12.2014/29204) (GBF).

We are pleased to confirm that our products sold to the Turkish market comply with these regulations, as to ensure that the supply of goods to our customer is not disrupted.

As you aware SEA, KKDIK and GBF regulations require the manufacture/importers or the downstream users to meet certain obligations;

- SEA
  - Labelling and Packaging: substances classified as hazardous per the CLP/GHS, shall be labelled in Turkish and packaged in accordance to the regulation.
  - Notification: substances classified as hazardous and imported into Turkey either on their own or in a mixture above the concentration limits, results in the classification of the mixture as hazardous shall be notified.
- KKDIK
  - Registration: substances manufactured or imported in quantities of one tonne or more per year per manufacturer or importer, unless they are exempted from the scope of registration, shall be registered.
  - Deadlines are as below:
    - Pre-SIEF (Pre-registration): 31.12.2020
    - Registration: 31.12.2023

#### IMPORTANT DISCLAIMER

This information has been gratuitously provided by INEOS Composites. Although it is intended to be accurate, INEOS Composites DISCLAIMS ANY AND ALL LIABILITY, EITHER EXPRESS OR IMPLIED. This information is based on many factors beyond INEOS Composites' control, including but not limited to the completeness and accuracy of information received, or the conditions prevailing when operations were observed and/or sampled. In choosing to rely on or use this information, you assume all risk including the results obtained and agree to indemnify INEOS Composites against any and all claims. All recommendations or suggestions must be evaluated by you to determine their applicability or suitability for your particular program. Any information claimed by INEOS Composites to be confidential or proprietary is not to be disclosed to any third party.

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- Our current intention is that we will pre-register all the substances that INEOS Composites manufactures and exports to Turkey prior to the deadline. We are also working with our suppliers to ensure that they will pre-register and ultimately register. While it is our intention to ensure registrations for substance exported to Turkey, we cannot guarantee or absolutely commit to future registrations. INEOS's Composites portfolio is subject to continual evaluation and optimization based on the market and customer needs, including market size and profitability.

To avoid our customers importing INEOS Composites products from INEOS Composites into Turkey having to notify/(pre-)register substances involved, INEOS Composites has appointed "REACH GLOBAL SERVICES Danışmanlık A.Ş." as their Only Representative (OR) per the regulations SEA and KKDIK. Following this appointment, substance(s) in our product portfolio have been notified where applicable under the SEA regulation and the notifications are kept updated. (Pre-)registrations will also be completed under KKDIK by our OR, where applicable. When the registration phase starts, we will establish a relationship with customers importing from INEOS Composites which will relieve them from their registration obligations as an importer and become a downstream user of INEOS Composites under these regulations in Turkey.

### Non-TURKISH Customers

INEOS's Composites non-TURKISH customers exporting their products within the scope of KKDIK to Turkey must ensure that their Turkey based importer will (pre-)register any of the relevant substances or monomers which are imported at levels over one metric ton per year. INEOS Composites does not cover third-party imports through an INEOS Composites Only Representative. To ensure you remain compliant with KKDIK, it is recommended that customers purchase materials from INEOS Composites Turkey. We are happy to advise you which (alternative) materials are available for you.

- GBF
  - Language and Format: SDS shall be provide in Turkish and in the required format.
  - Authorisation: Turkish SDS shall be authorized by a Turkish certified expert. You will find this information in section 16.
  - Notification: Authorised Turkish SDS shall be submitted to the Ministry.
  - Validity: Turkish SDSs could be prepared per the regulation by 31.12.2023.

Hazard classifications, Safety Data Sheets (SDS) and labels for INEOS Composites products are compliant with both the SEA and GBF Regulations, following the most recent deadline of June 2016.

For additional information on Product Regulatory at INEOS Composites, visit our website's Safety, Health and Environment (SHE) page at: [www.ineos.com/composites-she](http://www.ineos.com/composites-she)

If you have questions regarding any Product Regulatory-related subject, please contact INEOS Composites via your sales or customer service representative or send an e-mail to [regulatory.composites@ineos.com](mailto:regulatory.composites@ineos.com).

Kind Regards,

A handwritten signature in blue ink, appearing to read 'MA', is positioned above the name Monica Adria.

Monica Adria

Product Regulatory Manager, EMEA