

REACH SVHC Statement

Effective date: 1 July 2020

Supersedes: 1 September 2019

REACH Substances of Very High Concern

Dear Customer,

The following information is provided in response to your request for INEOS's Composites position concerning the presence of Substances of Very High Concern (SVHCs) in the products we manufacture, market and sell to customers in the European Union (EU).

INEOS Composites can confirm that:

- Procedures are in place to ensure compliance with the REACH obligations of a supplier (see appendix 1) for proactively and reactively informing our customers in situations where SVHCs are present in our products. Additionally, as a general rule, INEOS Composites will provide you with the latest version of the Safety Data Sheet (SDS) upon product purchase. If an SVHC is present in any of the products you purchase from INEOS Composites, the substance will be listed on the European SDS (at "any known concentration" equal to or greater than 0.1 %).
- The current INEOS Composites Performance Materials portfolio does not contain an SVHC substances at 0.1% or higher
- Where applicable, you will see these substances identified on the European SDS for the product. Although not legally required, INEOS Composites is working on the reformulation of (some of) these products, where there is a benefit from reformulation to INEOS Composites and our customers. In specific cases, you may be contacted to review the options.
- As additional SVHCs are placed on the candidate list, we will review the formulations of our product portfolio to phase out these substances from our products, where possible.

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

If you have questions regarding any REACH-related subject, please contact INEOS Composites via your sales or customer service representative or send an e-mail to reach.composites@ineos.com.

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.

REACH will continue to apply in the United Kingdom until the United Kingdom exits the European Union. REACH or REACH-type requirements may continue to apply after the United Kingdom exits the EU, however this is unclear at the moment. Once the consequences of the exit become clearer, INEOS Composites will decide on necessary steps to be taken.

Kind Regards,



Monica Adria

Product Regulatory Manager EMEA

Appendix 1: Substances of Very High Concern

SVHCs, also known as “Annex XIV substances,” are clearly described in Article 57 of Regulation (EC) No 1907/2006 (the “REACH Regulation”). These substances are identified according to ECHA (European Chemicals Agency):

- **CMR** substances; Carcinogenic, Mutagenic or toxic to Reproduction, meeting the criteria for classification in category 1 or 2 in accordance with Directive 67/548/EEC,
- **PBT** substances; Persistent, Bioaccumulative and Toxic according to the criteria in Annex XIII of the REACH regulation, or
- **vPvB** substances; very Persistent and very Bioaccumulative according to the criteria in Annex XIII of the REACH Regulation, and/or
- Identified, on a case-by-case basis, from scientific evidence as causing probable serious affects to human health or the environment of an equivalent level of concern as those above (e.g., endocrine disrupters).

In June 2020, ECHA updated the candidate list of SVHCs, which now contains 209 substances. The list is incomplete and more substances may be added. Please use the following link to see the latest version of the candidate list:

<http://www.echa.europa.eu/web/guest/candidate-list-table>

These substances may become subject to Authorisation. As result the following obligations apply;

Obligations

ARTICLES

- **From 28 Oct. 2008**, EU and European Economic Area (EEA) suppliers of articles which contain substances on the Candidate List in a concentration above 0.1% (w/w) **must**
 - **provide sufficient information, available to them, to their customers and on request to consumers within 45 days of the receipt of this request.** This information must ensure safe use of the article and, as a minimum, include the name of the substance.
 - **notify the Agency**, according to article 7 (2), **if the substance is present in those articles** in quantities totaling over 1 tonne per producer or importer per year.

SUBSTANCES

- **From 28 Oct. 2008**, EU and EEA suppliers of a substance have to **provide a safety data sheet to their customers** when the substance is on the Candidate List.

PREPARATIONS

- **From 28 Oct., 2008**, EU and EEA suppliers of a preparation not classified as dangerous according to Directive 1999/45/EC have to **provide the recipients, at their request, with a safety data sheet** if the preparation contains at least one substance on the Candidate List and its individual concentration is at least 0.1% (w/w) for non-gaseous preparations and at least 0.2% by volume for gaseous preparations.

INEOS's Composites products, in general, are preparations (mixtures of several substances).