

UPM Raflatac Compliance Statement for APAC Product(s)

UPM Raflatac actively complies with and anticipates applicable laws and regulations to ensure that our raw materials, semi-finished products and final products are as safe as they can be – for the environment, everyone in the manufacturing and supply chains and consumers.

We view legislative change and consumer concerns positively, as a continual source of opportunity for the creation of new business and new product solutions.

In this document, we have compiled regulatory and legislative statements of compliance relating to all UPM Raflatac products in APAC.

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Allergens

UPM Raflatac does not add the following food allergens as listed in Annex II of Regulation (EU) No 1169/2011 article 9:

- | | |
|------------------------------|-----------------------------------|
| 1. Cereals containing gluten | 8. Nuts |
| 2. Crustaceans | 9. Celery |
| 3. Eggs | 10. Mustard |
| 4. Fish | 11. Sesame seeds |
| 5. Peanuts | 12. Sulphur dioxide and sulphites |
| 6. Soybeans | 13. Lupin |
| 7. Milk | 14. Molluscs |

Please note that Regulation (EU) No 1169/2011 is explicitly for food and ingredients in food and is not concerning food packaging material.

This information is provided based on our knowledge of label stock raw materials and processing, review of material safety data sheets, and limited supplier surveys. Please note that we have not tested our products to confirm the presence or absence of these substances. UPM Raflatac manufacture self-adhesive label stock for use by label converters, the laminate is designed to be used only for labelling products and is not intended for consumption.

Aromatic amines

Aromatic amines are not used in the manufacture or formulation of UPM Raflatac products.

Asbestos

Asbestos is not used in the manufacture or formulation of UPM Raflatac products.

Azocolourants and azodyes

Azocolourants and azodyes are not used in the manufacture or formulation of UPM Raflatac products.

Bisphenol A (BPA), Bisphenol B (BPB) and Bisphenol S (BPS)

UPM Raflatac does not use Bisphenol A, Bisphenol B and Bisphenol S in the manufacture of self-adhesive label-stock and associated products either as a raw material or as an additive. Please note that some direct thermal faces and thermal boards may contain Bisphenol S.

California Safe Drinking Water and Toxic Enforcement Act of 1986 (Prop 65)

The California Safe Drinking Water and Toxic Enforcement Act of 1986, otherwise known as Prop 65, is a risk-based regulation that requires a consumer warning for the potential exposure to a listed substance in the state of California. UPM Raflatac's self-adhesive labels are semi-finished products that are typically used as a component of a packaging system. Generally, UPM Raflatac does not suspect exposures to Prop 65 substances at levels requiring a warning from reasonably anticipated end uses of the products. UPM Raflatac's Prop 65 risk assessments are product specific, and as such, are addressed on a case-by-case basis. Please contact your customer service representative if you require a product specific statement.

Cobalt

UPM Raflatac does not intentionally add cobalt in the manufacture of self-adhesive label-stock and associated products either as a raw material or as an additive and as such, has no reason to suspect it to be present in our products other than trace amounts that are ubiquitous in nature.



Conflict minerals, Regulation (EU) 2017/821

UPM Raflatac does not intentionally add any tantalum, tin, tungsten or gold from suppliers who use ores sources from the Democratic Republic of Congo or adjoining conflict-affected or high-risk areas, in our manufacturing process. This information provided is based on our knowledge of label stock raw materials and processing, review of material safety data sheets, and supplier surveys.

Dimethyl fumarate (DMF)

UPM Raflatac does not use dimethyl fumarate, DMF (CAS No 624-49-7) in the manufacture of the self-adhesive laminates and associated products either as a raw material or as an additive.

Formaldehyde

Formaldehyde is not intentionally used as a raw material in the manufacture of self-adhesive laminate and associated products by UPM Raflatac or by our raw material suppliers.

Halogen Free

The International Electrotechnical Commission (IEC) defines halogen free based upon the content level of chlorine and bromine as defined by industry specifications IEC61249-2-21 and IPC-4101B. Products are classified and declared halogen free providing they meet the following content restriction.

Halogen Industry Specification:

Chlorine (Cl) < 900 ppm

Bromine (Br) < 900 ppm

Chlorine (Cl) + Bromine (Br) < 1500 ppm

UPM Raflatac does not intentionally add any of the above substances in the manufacture of self-adhesive label-stock and associated products. The statement is based on our knowledge of label-stock processing and raw material, review of material safety data sheets and limited supplier surveys. Please note that we have not performed any laboratory analysis to confirm the presence or absence in our products.

Heavy metal content

European Commission Directive 94/62/EC and the Toxics in Packaging Clearinghouse (TPCH) formerly known as the Coalition of Northeastern Governors' (CONEG, US) both require no intentional addition of lead, cadmium, mercury or hexavalent chromium to packaging or packaging components. Furthermore, the sum concentration of these metals due to incidental introduction into packaging or packaging components must not exceed 100 parts per million (ppm).

Third-party laboratory analysis of various UPM Raflatac label stock products representative of its product range indicates the sum concentration of these metals is less than 100 ppm.

Typical concentrations found in UPM Raflatac products are:

- Lead less than 2 ppm
- Cadmium less than 2 ppm
- Mercury less than 2 ppm
- Hexavalent chromium less than 2 ppm

UPM Raflatac does not intentionally add lead, cadmium, mercury or hexavalent chromium to self-adhesive laminates and associated products. Based on our knowledge of label-stock

processing, raw materials, review of available safety data sheets, supplier survey information and representative analysis, we have no reason to suspect any UPM Raflatac products contains a sum concentration of these heavy metals greater than 100 ppm.

Organotin Compounds

UPM Raflatac does not intentionally add organotin compounds, Monobutyltin (MBT), Monoctyltin (MOT), Tetrabutyltin (TeBT) and Tetraoctyltin (TeOT).

This information is provided based on our knowledge of label stock raw materials and processing, review of material safety data sheets, and supplier surveys. Please note that we have not tested our products to confirm the presence or absence of these substances.

Ozone-depleting chemicals

UPM Raflatac does not add the ozone-depleting substances listed below in the manufacturing processes of our factories, and as such, has no reason to suspect these substances to be present in its products.

| | |
|--------------------------------------|-----------------------------------|
| 1,1,1-trichloroethane CAS No 71-55-6 | Bromochloromethane CAS No 74-97-5 |
| Carbon tetrachloride CAS No 56-23-5 | CFCs |
| Halons | HBFCs |
| HCFCs | Methyl bromide CAS No 74-83-9 |

Packaging waste, European standards EN 13427-13432

These European Norms are designed to provide compliance with various aspects of Directive 94/62/EC on Packaging and Packaging waste.

EN 13427 Packaging – Requirements for the use of European Standards in the field of packaging and packaging waste.

This European standard provides the requirements and procedures for applying the EN13428 - 13432 packaging standards.

EN13428 Packaging – Requirements specific to manufacture and composition – Prevention by source reduction.

UPM Raflatac is continually developing products to help minimize packaging by reducing the grammage of materials. However, this is only possible, provided that the materials' required technical properties are maintained.

UPM Raflatac self-adhesive laminate is in conformity with the minimisation requirement in Annex II of Directive 94/62/EC paragraph 1. In accordance with the methodology laid out in CEN/TR 13695-2:2019 Part 2: "Requirements for measuring and verifying dangerous substances present in packaging, and their release into the environment". UPM Raflatac has no reason to suspect that any substances or preparations used in the manufacturing process of laminate classified as dangerous to the environment are likely to be released in emissions, ash or leachate.

EN13429 Packaging – Reuse

UPM Raflatac manufactures self-adhesive laminate for use as labels; they are not designed for reuse as labels but self-adhesive labels can facilitate the reuse of the main packaging and logistics containers that are labelled. Further information is available on request.

EN13430 Packaging – Requirements for packaging recoverable by material recycling

A label usually becomes an integral part of the product to which it is applied. It is therefore important that both the packaging design and choice of label take into account the use of compatible materials for recycling. For specific guidance on labeling packaging and packaging recyclability, please get in touch with your UPM Raflatac contact.

EN13431 Packaging – Requirements for packaging recoverable in the form of energy recovery

Self-adhesive laminates can be used as an alternative source of fuel in conjunction with energy recovery. UPM Raflatac self-adhesive laminates provide an excellent source of fuel – they have very low levels of heavy metals and have a calorific value in the region of 20MJ/kg with an ash content of approximately 5%.

EN13432 Packaging – Requirements for packaging recoverable through composting and biodegradation – Test scheme and evaluation criteria for the final acceptance of packaging

Composting of the packaging can be considered as an option if prevention, reuse, recycling, or other types of recovery are not possible, and only where suitable home or industrial composting is available. Further information regarding composting and biodegradation is available on request.

Per- and polyfluoroalkyl substances (PFAS)

UPM Raflatac does not intentionally add Per- and polyfluoroalkyl substances (PFAS), specifically, Perfluorooctanoic acid (PFOA; CAS RN: 335-67-1) or Perfluorooctanesulfonic acid (PFOS; CAS RN: 1763-23-1) to its products, and as such, has no reason to suspect these substances are present in its products.

Persistent Organic Pollutants (POPS) Regulation (EC) 2019/1021

UPM Raflatac does not intentionally add any of these substances in Part A of Annex I of Regulation (EC) 2019/1021 (including the amendment to Annex I in Delegated Regulation (EU) 2024/2570) listed below in the manufacturing processes of any of our factories, and as such, has no reason to suspect these substances to be present in its products.

| | | |
|----------------------------------------------|--------------------|-------------------------------------|
| Tetrabromodiphenyl ether | Dieldrin | Mirex |
| Pentabromodiphenyl ether | Endrin | Toxaphene |
| Hexabromodiphenyl ether | Heptachlor | Hexabromobiphenyl |
| Heptabromodiphenyl ether | Endosulfan | Hexabromocyclododecane |
| decaBDE | Hexachlorobenzene | Hexachlorobutadiene |
| PFOS & its derivatives | Chlordecone | PCP & its salts & esters |
| DDT | Aldrin | Polychlorinated naphthalenes |
| Chlordane | Pentachlorobenzene | SCCPs |
| Hexachlorocyclohexanes, including lindane | PCB | PFOA, its salts & related compounds |
| Methoxychlor. | Dicofol | PFHxS its salts & related compounds |

Phthalates

Based on information from our raw material suppliers we can confirm that the self-adhesive laminates and associated products complies with the phthalates as listed in Regulation (EC) No 552/2009 (amending REACH Regulation (EC) No 1907/2006 regarding Annex XVII) for use in toys and childcare products and with the US Consumer Product Safety Improvement Act, Section 108, which has the same substances and limits:

| | | |
|------------------------------|--------|----------------------------------|
| Bis (2-ethylhexyl) phthalate | (DEHP) | CAS No 117-81-7 |
| Dibutyl phthalate | (DBP) | CAS No 84-74-2 |
| Benzyl butyl phthalate | (BBP) | CAS No 85-68-7 |
| Di-'isononyl' phthalate | (DINP) | CAS No 28553-12-0 and 68515-48-0 |
| Di-'isodecyl' phthalate | (DIDP) | CAS No 26761-40-0 and 68515-49-1 |
| Di-n-octyl phthalate | (DNOP) | CAS No 117-84-0 |

PVC / PVdC

Halogenated organic compounds such as Polyvinyl chloride (PVC) and Polyvinylidene chloride (PVdC) are not used by UPM Raflatac factories in the manufacture of standard self-adhesive laminate roll stock and associated products, nor are they used or added by any of our raw material suppliers.

The exceptions are particular specialist products that use PVC as a label face material or filmic products coated with PVdC. These products are clearly identified in either the product name and/or as stated on the relevant technical information sheets.

This information is based upon our knowledge of label-stock processing and raw materials, review of material safety data sheets, and supplier surveys. Please note we have not performed any laboratory analysis to confirm the absence or presence of any of the substances listed above.

REACH EU Regulation (EC) No 1907/2006

Article 33 of Registration, Evaluation and Authorization of Chemicals (REACH) obligates article suppliers to provide relevant information about the presence of substances included on the Candidate List of Substances of Very High Concern (SVHC) at concentrations greater than 0.1% w/w in their products to recipients of these articles. The "Candidate List of Substances" was last updated on **2025-01-21**. In this case, "recipients" refers to industrial and professional users and distributors of these products.

Information regarding SVHC's in UPM Raflatac APAC products can be found in a separate statement [here](#).

RoHS, Directive 2011/65/EC (including Delegated Directive (EU) 2015/863)

The Directive 2011/65/EU (known as RoHS2) of 8 June 2011 and Commission Delegated Directive (EU) 2015/863 (RoHS3) of 31 March 2015 amending Annex II to Directive 2011/65/EU established maximum concentration values for 10 restricted substances in electrical and electronic equipment (EEE) placed on the market in EU member states.

RoHS restricted substances and their maximum allowable concentration values by weight in homogeneous materials include:

| | |
|-----------------------------------------|-------|
| Lead | 0.1% |
| Mercury | 0.1% |
| Cadmium | 0.01% |
| Hexavalent chromium | 0.1% |
| Polybrominated biphenyls (PBB's) | 0.1% |
| Polybrominated diphenyl ethers (PBDE's) | 0.1% |
| Bis(2-ethylhexyl) phthalate (DEHP) | 0.1% |
| Benzylbutyl phthalate (BBP) | 0.1% |
| Dibutyl phthalate (DBP) | 0.1% |
| Diisobutyl phthalate (DIBP) | 0.1% |

UPM Raflatac does not intentionally use the RoHS restricted substances and has no reason to suspect that these substances are present in our self-adhesive label stock at levels above the

allowable concentrations. This statement is made based on information from our raw material suppliers and our knowledge of label-stock raw materials and processing.
UPM Raflatac has not conducted laboratory analysis to determine the presence or absence of RoHS regulated substances in our products.

Polycyclic Aromatic Hydrocarbons (PAHs) Regulation (EU) No 1272/2013

UPM Raflatac products are not designed or intended for direct as well as prolonged or for short-term repetitive contact with the human skin or the oral cavity under normal or reasonably foreseeable conditions of use. Therefore, our products do not come under the scope of the Regulation (EU) No 1272/2013.

None of the eight listed polycyclic aromatic hydrocarbons (PAHs):

| | |
|---------------------|--------------------------|
| Benzo[a]pyrene, | Benzo[b]fluoranthene, |
| Benzo[e]pyrene, | Benzo[j]fluoranthene, |
| Benzo[a]anthracene, | Benzo[k]fluoranthene and |
| Chrysen, | Dibenzo[a,h]anthracene, |

are used in UPM Raflatac's manufacture of self-adhesive label-stock and associated products either as an additive or as a raw material. Based on information from our raw material suppliers we have no reason to suspect that any UPM Raflatac products contain PAHs listed in the regulation above the limits.

Toxic Substances Control Act (TSCA)

UPM Raflatac can confirm that the substances listed below are not intentionally included in our products and we have no reason to suspect their presence in our products at concentrations above allowable regulatory levels (as applicable).

- | | |
|-----------------------------------------|------------------------------|
| • Phenol, isopropylated phosphate (3:1) | (PIP; CAS RN: 68937-41-7) |
| • 2,4,6-Tris(tert-butyl) phenol | (TTBP; CAS RN: 732-26-3) |
| • Pentachlorothiophenol | (PCTP; CAS RN: 133-49-3) |
| • Decabromodiphenyl ether | (DecaBDE; CAS RN: 1163-19-5) |
| • Hexachlorobutadiene | (HCBd; CAS RN: 87-68-3) |

Tri-substituted organostannic compounds

Tri-substituted organostannic compounds, Tributyl Tin (TBT) and Triphenyl Tin (TPT) compounds are not used in the manufacture or formulation of UPM Raflatac products.

Please note that further processing and converting of the product must be assessed by the downstream users of the product and they must make their own determination for the suitability of their products for their desired end use applications.

The statements provided in this correspondence are based on knowledge of label stock processing and raw materials, review of available safety data sheets and supplier survey information. Please note that no laboratory analysis has been conducted to confirm the presence or absence of these substances in our products. Supply chain information currently available is not comprehensive for all raw materials used in our manufacturing processes and that collecting information from the raw material supply chain is an on-going activity that may prompt revision of this information without notice.

Summary of changes

| Date | Comment |
|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| July 8 th 2024 | Updated the REACH statement with reference to the date when the candidate list of Substances was updated. |
| November 26 th 2024 | Updated the REACH statement with reference to the date when the candidate list of Substances was updated. |
| November 27 th 2024 | Modified the REACH statement. |
| December 18 th 2024 | Modified the REACH statement to include a link to the APAC SVHC substances. Updated the section on Persistent Organic Pollutants (POPS) Regulation (EC) 2019/1021 including reference to Delegated Regulation (EU) 2024/ 2570 and added Methoxychlor. |
| December 20 th 2024 | Correction to the section on Persistent Organic Pollutants (POPS). |
| January 22 nd 2025 | Updated the REACH statement with reference to the date when the candidate list of Substances was updated. |

Disclaimer:

This information is based on our most up-to-date knowledge and experience. Information given is for guidance only and subject to change. We cannot assume any liability for damage caused through its use. This statement does not constitute any warranty, express or implied and is only intended for the Raflatac customer and cannot therefore be transferred to any third party. We cannot assume any liability for using our products in conjunction with other materials and customer must make own qualification and suitability testing before using Raflatac material as part of customer products. Suitability of Raflatac material in customer products is solely the customer's responsibility. All our products are sold subject to UPM Raflatac's general conditions, available at www.upmraflatac.com and upon request. In case of any discrepancies, the English version of this document shall prevail. This publication replaces all previous versions published.