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According to the requirements of Article 6(3) of the EU REACH regulation, any manufacturer or importer of a polymer that comprises more than 2% of (a) chemically bound monomer(s) in a volume exceeding 1000 kg per year has to register the monomer(s) used. SABIC appointed its affiliate SABIC Petrochemicals B.V. based in the Netherlands to fulfil its tasks and responsibilities for complying with the legal requirements of the EU REACH regulation. SABIC Petrochemicals B.V., representing SABIC, has successfully registered the monomer(s) used in the SABIC Product under the EU REACH regulation.

Plastic materials, such as produced by SABIC are mixtures (the polymer part, residual monomer(s), stabilisers, additives, etc.). According to the EU REACH regulation mixtures do not need separate registration if the individual parts of the mixture are (pre)-registered.

For substances for which SABIC is a Downstream User, and thus has no registration obligation itself, SABIC has confirmed with all its suppliers that their registration obligations under the EU REACH regulation have been met. SABIC will not use any product or will do business with a supplier that is not compliant with the EU REACH regulation. SABIC Petrochemicals B.V., representing SABIC, has registered all (imported) substances for which there was a registration obligation and will continue to ensure SABIC's regulatory compliance with the EU REACH regulation.

Please note that the EU REACH registration of the substance(s) subject to registration in the SABIC Product is restricted to the product as manufactured by SABIC in the EU or imported by SABIC Petrochemicals B.V. and cannot be used by or relied upon by any third party.

This SABIC Product is a non-hazardous mixture according to the criteria for classification of EU Regulation (EC) 1272/2008 on the classification, labelling and packaging of substances and mixtures, and its amendments. Therefore, this non-hazardous SABIC Product is not subject to the requirements of Article 31(1) and 31(2) of the EU REACH regulation.

Since SABIC has no legal obligation to set up a Safety Data Sheet (SDS) according to Article 31 (6) and Annex II of the EU REACH regulation, the fact that SABIC issues such an SDS should be regarded as information provided on a voluntary basis as part of SABIC's Responsible Care efforts. It should be noted that an SDS, issued by SABIC, for this SABIC Product does not always contain all subheadings as listed in Part B of Annex II of the EU REACH Regulation, or all of the mandatory information on its use and application.

Regarding the presence of Substances of Very High Concern, we can inform you as follows:

According to the recipe in the production of the SABIC Product, SABIC does not intentionally add:

- Substances of Very High Concern (SVHC), included in the most recent and authentic "Candidate List of Substances of Very High Concern for Authorisation", in a concentration above the threshold limit of 0.1%, as published by the European Chemicals Agency (ECHA) on <http://echa.europa.eu/web/guest/candidate-list-table>, dated January 23, 2024 (List of 240 substances).
- Substances subject to the provisions of Annex XIV (Authorisation) or Annex XVII (Restriction) of the EU REACH regulation, and its amendments.

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- Substances listed in the UK REACH Candidate List of Substances of Very High Concern (SVHCs) for Authorisation in accordance with Article 59(10) of UK REACH.

Although these substances as such are not intentionally added to the SABIC Product, and the absence has not been checked by tests, this does not exclude the presence of negligibly slight traces due to, amongst others, impurities in the components supplied by external parties and used in the production of such components.

Microplastics

As stated in the European Green Deal and the Circular Economy Action Plan, the European Commission (EC) is committed to fight microplastics pollution. The EC adopted Commission Regulation (EU) 2023/2055 restricting sales of synthetic polymer microparticles on their own or intentionally added to mixtures - better known as “the microplastics restriction”. The regulation amends Annex XVII to the EU REACH regulation as entry 78 and entered into force on October 17, 2023, with some sector specific transition periods ranging from 4 years to 12 years.

The new restriction aims to reduce emission of intentionally added microplastics from products such as cosmetics, household and industrial detergents, cleaning products or granular infill for use on synthetic sports surfaces. It covers all synthetic polymer particles below five millimeters (mm) that are organic, insoluble and resistant to (bio)degradation.

Manufacturers and industrial downstream users of synthetic polymer microparticles in the form of pellets, flakes, and powders used as feedstock in plastic manufacturing at industrial sites are exempt from the sales ban as stated in paragraph 4(a) of the annex to the regulation. Meanwhile, the loss of plastic pellets represents an important industrial source of microplastics in the environment. According to the regulation, manufacturers should (1) provide instructions with respect to use and disposal to industrial downstream users from October 17, 2025 onwards, and (2) fulfill reporting obligations to authorities related to pellet loss to the environment from May 31, 2026 onwards. The plastic pellet supply chain, that SABIC is part of, is already putting in place voluntarily initiatives (including reporting) to minimize pellet loss.

SABIC is committed to implementing Responsible Care® and global sustainability programs (such as The Alliance to End Plastic Waste, Operation Clean Sweep®, etc.) throughout the value chain that are designed to prevent and address accidental releases of plastic pellets into the environment. Accordingly, SABIC recommends implementation of systems and practices by downstream users to prevent and address incidental releases in order to protect the aquatic environment from potential (long-term) negative effects of plastic materials. Please note that Safety Data Sheets as supplied by SABIC already provide instructions for use and disposal explaining how to prevent releases to the environment.

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Phthalates / Endocrine Disruptors / CMR substances / Cosmetics Regulation / EuPIA Exclusion Policy

According to the recipe in the production of the SABIC Product, the following substances as such are not intentionally added:

- Phthalates (the product is manufactured using a phthalate-free catalyst system).
- Substances listed in the Endocrine Disruptor Lists I, II and III (www.edlists.org; latest update November 2023). That also covers substances referred to in item I and II of Article L. 5232-5 of the Public Health Code, France.
Please note that these lists include the dithiocarbamate based fungicide 'Mancozeb' (CASRN 8018-01-7) and 'Cholecalciferol' (Vitamin D3; CAS 67-97-0).
- Substances classified as CMR (all categories) according to the Regulation (EC) 1272/2008 on the classification, labelling and packaging of substances and mixtures and its amendments, excluding authorised substances as referred to in Articles 5 and 6 of EU Commission Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food, and its amendments.
- "Substances prohibited in cosmetic products" as listed in Annex II or "Substances which cosmetic products must not contain except subject to the restrictions laid down" as listed in Annex III of EU Regulation (EC) No 1223/2009/EC on cosmetic products including amendments up to and including Commission Regulation (EU) 2023/1545 of 26 July 2023.
- Substances (Group A – G) as listed in the EuPIA Exclusion Policy for printing inks and related products. 6th Edition of March 2024.

California Proposition 65

According to the recipe in the production of the SABIC Product, the following substance(s) as such is / are not intentionally added:

- Substances (at levels resulting in exceedance of indicated safe harbor levels) mentioned in the list of chemicals known to cause cancer or reproductive toxicity (Safe Drinking Water and Toxic Enforcement Act of 1986) of the California Proposition 65, updated December 29, 2023.

Animal origin, TSE/BSE, Kosher/Halal

According to the recipe in the production of the SABIC Product, the following substances as such are not intentionally added:

- animal substances or substances of animal origin.
- alcohol

The absence of these substances has not been checked by tests.

Based on the absence of animal substances or substances of animal origin in the SABIC Product, to the best of our knowledge, the risk of transmission of Transmissible Spongiform

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Encephalopathies (TSE) / Bovine Spongiform Encephalopathy (BSE) is not relevant.

It has to be recognized that the SABIC Product is not produced in an exclusive "Halal or Kosher Certified" surrounding.

Per- and PolyFluorinated Alkyl Substances (PFAS)

Per- and Polyfluorinated Substances (hereinafter “PFAS” ¹) are a chemical class with diverse molecular structures and physical, chemical and biological properties. The term PFAS is a broad, general, non-specific term that does not inform whether a substance, which fits into this chemical class, is harmful or not ².

There are currently no global absolute bans on PFAS, but a comprehensive package of strategies on taking broad-scale regulations or restrictions worldwide to regulate PFAS is currently under development.

This SABIC Product does not contain intentionally added PFAS. According to the formulation in the production of the SABIC Product, the following substances as such are not intentionally used or added:

- Per- and PolyFluorinated Alkyl Substances (PFAS) including, but not limited to:
 - Per- and PolyFluorinated Carboxylic Acids (PFCA) and their derivatives (e.g. Long Chain PerFluorinated Alkyl Carboxylates (LCPFAC) and their salts and precursors, TFA, PFPA, HFBA, PFHxA, PFOA, PFNA and “GenX substances”)
 - Per- and PolyFluorinated Sulfonic Acids (PFSA) and their derivatives (e.g. PFBS, PFHxS, PFOS, PFOSA)
 - PerFluoroEther Carboxylic Acids (PFECA) and their derivatives
 - PerFluoroEther Sulfonic Acids (PFESA) and their derivatives
 - PerFluoroAlkyl Phosphonic or Phosphinic Acids (PFPhA, PFPiA) and their derivatives
 - Fluorinated polymers (e.g. PTFE, FEP, PVDF, PVF)
 - PerFluoroPolyEthers (PFPE)

¹ [About PFASs - OECD Portal on Per and Poly Fluorinated Chemicals](#)

² <https://www.oecd.org/chemicalsafety/portal-perfluorinated-chemicals/terminology-per-and-polyfluoroalkyl-substances.pdf>

PPW / ELV / RoHS / WEEE / CONEG

The chemical composition of the SABIC Product complies with:

- EU Directive **94/62/EC** of 20 December 1994 on packaging and packaging waste (**PPW**), up to and including EU Directive (EU) 2018/852 of 30 May 2018.
- EU Directive **2000/53/EC** of 18 September 2000 on end-of life vehicles (**ELV**), up to and including Commission Delegated Directive (EU) 2023/544 of 18 September 2023.

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- EU Directive **2002/95/EC** of 27 January 2003 on the restriction of the use of certain hazardous substances in electrical and electronic equipment (**RoHS 1**), recast by European Directive **2011/65/EU (RoHS 2)**, amended by European Directive (EU) **2015/863** of 31 March 2015 (**RoHS 2 amendment**), up to and including Commission Delegated Directive (EU) 2023/1437 of 4 May 2023.
- China Standard GB/T 26572-2011, "Requirements of concentration limits for certain restricted substances in electrical and electronic products." issued by China's Ministry of Industry and Information Technology (MIIT).

Since the SABIC Product does not contain brominated flame-retardants, this material is not subject to the selective waste requirements of Annex VII of Directive **2012/19/EU** of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (**WEEE**) and amendments.

With respect to heavy metals (Cadmium, Mercury, Lead and hexavalent Chromium), the chemical composition of the SABIC Product complies with:

- EU Directive **94/62/EC** of 20 December 1994 on packaging and packaging waste (**PPW**), up to and including EU Directive (EU) 2018/852 of 30 May 2018.
- EU Directive **2000/53/EC** of 18 September 2000 on end-of life vehicles (**ELV**), up to and including Commission Delegated Directive (EU) 2023/544 of 18 September 2023.
- Coalition of Northeastern Governors (**CONEG**) developed "**Model Toxics in Packaging Legislation**".

The SABIC Product is not classified as "hazardous mixture" according to EU Regulation (EC) 1272/2008 on the classification, labelling and packaging of substances and mixtures (**CLP**), and amendments.

We can inform you that based on the acute toxicity information (oral rat LD₅₀) for high molecular weight polymers in general, to the best of our knowledge, it is our opinion that the SABIC Product is essentially non-toxic if used and handled according to specifications outlined in the Safety Data Sheet (SDS).

We advise you to follow the safety guidelines and recommendations in the SDS.

Certain restricted substances

According to the recipe in the production of the SABIC Product, the following substances as such are not intentionally used or added:

- Acetone
- Acetyl tributyl citrate (ATBC)
- Acrylamide(s)
- Acrylonitrile
- Active and intelligent materials as defined in Commission Regulation (EC) No 450/2009 of 29 May 2009.

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- Substances (above the mentioned concentration levels) as listed in the Global Automotive Declarable Substance List (GADSL) reference list, version V1.0, February 1st, 2024.

* This statement does not include information about presence or absence of PFAS, please find information about PFAS in the respective chapter of this declaration. This statement does not include information about presence or absence of Critical Raw Materials (CRM) by the European Commission.

- “Substances causing allergies or intolerances” as listed in Annex II of Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers. These include: Cereals, Crustaceans, Eggs, Fish, Peanuts, Soybeans, Milk, Nuts, Celery, Mustard, Sesame seeds, Sulphur dioxide and sulphites, Lupin and Molluscs
- Substances on the OSPAR List of Chemicals for Priority Action (Revised 2013)
- Substances that could potentially be converted into nitrosamine compounds (nitrosatable substances) in any of the manufacturing steps and applied process conditions.
- Substances classified as Persistent, Bioaccumulative, and Toxic (PBT) Chemicals under Toxic Substances Control Act (TSCA), Section 6(h), as amended by the Frank R. Lautenberg Chemical Safety for the 21st Century Act, including those issued by the US EPA via five final rules on January 6, 2021:
 - Decabromodiphenyl ether (DecaBDE) CASRN 1163-19-5
 - Phenol, isopropylated phosphate (3:1) [PIP (3:1)] CASRN 68937-41-7
 - Pentachlorothiophenol (PCTP) CASRN 133-49-3
 - Hexachlorobutadiene (HCBd) CASRN 87-68-3
 - 2,4,6-tris(tert-butyl) phenol, (2,4,6-TTBP) CASRN 732-26-3
- Thiurams
- Titanium acetylacetonate (TAA)
- Triaryl phosphites, Triclosan, Triclocarban
- Triethyl amine
- 2,2,4-Trimethyl-1,3-pentanediol diisobutyrate (TXIB)
- Tris(nonylphenyl, branched and linear) phosphite (TNPP)
- Vinyl Chloride Monomer (VCM)
- Volatile Organic Compounds in a concentration exceeding the limit (3%) of the Swiss regulation SR 814.018: “Verordnung über die Lenkungsabgabe auf Flüchtigen Organischen Verbindungen (VOCV)” of November 12th 1997
- Xylene

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Halogens

Regarding the presence of halogens in the SABIC Product we can inform you that according to the recipe in the production the following substances as such are not intentionally used or added:

- Halogens (Bromine, Chlorine, Fluorine, Iodine, Astatine) or halogen compounds.

The SABIC Product is a “Halogen-Free” material according to the International Electrochemical Commission’s (IEC) definition of Halogen-Free (IEC 61249-2-21).

SABIC® TRUCIRCLE™ certified renewable and circular products

SABIC is committed to provide its customers with more sustainable solutions in order to accelerate the circular carbon economy. SABIC launched its TRUCIRCLE™ certified circular and renewable portfolio in an effort to transform today's linear economy into a sustainable circular economy for plastics.

The chemical recycling concept of SABIC® TRUCIRCLE™ certified circular and renewable polymers is referred to as advanced or feedstock recycling. It is based on thermal conversion technologies to produce pyrolysis oil (circular) or bio-based (renewable) feedstocks as primary outputs. These are used as alternative cracker feedstock sources to (partly) replace fossil-based cracker feedstocks ^{a)}. The application of feedstock recycling in the manufacture of SABIC® TRUCIRCLE™ certified circular and renewable polymers ensures that these polymers are identical to their conventional fossil-based counterparts in both technical and regulatory respect. They are drop-in replacements for their fossil feedstock-based counterparts for use, under the same conditions, in all application areas without need for additional measures.

At this moment, there are two ways to identify SABIC® TRUCIRCLE™ certified circular and renewable products ^{b)}. The first way is via specific suffixes that are added to the names of their original fossil-based counterparts. The second way is through feedstock indicators in combination with the name of the original fossil feedstock-based products. These indicators are displayed in the customer portal and/or mentioned on invoice / shipping documentation.

Both naming options are depicted in tables 1 and 2 below:

Suffix	Feedstock origin
C	Mixed Plastic Waste
CO	Ocean Bound Plastic
B	Crude Tall Oil
BU	Used Cooking Oil
BV	Vegetable Oil Processing Residues

Table 1. Product identification via suffixes

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Indicator	Feedstock origin
TRUCIRCLE™ Circular MPW	Mixed Plastic Waste
TRUCIRCLE™ Circular OBP	Ocean Bound Plastic
TRUCIRCLE™ Renewable CTO	Crude Tall Oil
TRUCIRCLE™ Renewable PFAD	Vegetable oil processing residues
TRUCIRCLE™ Renewable UCO	Used Cooking Oil

Table 2. Product identification via indicators

Example: SABIC® LDPE HP0823NN - 00900 (TRUCIRCLE™ Renewable UCO) is a TRUCIRCLE™ certified renewable version of fossil feedstock based SABIC® LDPE HP0823NN - 00900.

The content of this document equally applies to the TRUCIRCLE™ certified circular and renewable variants of fossil feedstock-based SABIC® LDPE HP0823NN - 00900.

- a) Additional supply sources may be added in the future.
- b) Product naming options may differ between product portfolios and may be subject to change. Customers will be informed accordingly.

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