

COMPLIANCE LETTER COATING FILM

- I. Letter of Guarantee**
- II. Food Safety Declaration**
- III. Material Composition Declaration**

I. LETTER OF GUARANTEE

Films coated with Polyethylene and Ethylene-vinyl acetate (EVA), and Paper Substrate coated with Polyethylene food grade polymers produced by OBEN HOLDING GROUP (OHG), according to the rules of requirements for food contact applications when leaving the factory. These products are manufactured under a management system that guarantees quality and safety product properties according to their respective specifications.

The guarantee of product properties for all films extends after six months from dispatch date.

OHG is not responsible for failures occurring of poor handling by storage conditions outside of the recommendations given in the SDS or misuse of the material by the customer.

II. FOOD SAFETY DECLARATION

OHG declares that their films coated with EVA or Polyethylene and Paper Substrate coated with Polyethylene, are manufactured according to various Food Safety Standards (regulation, normative i.a), and its related Food Safety Requirements, as detailed under the following items:

1. Good Manufacturing Practices (GMP)
2. Europe
3. USA
4. Canada
5. China
6. Japan
7. Mercosur
8. Perú
9. Colombia
10. Migration of Heavy Metals
11. Total Migration
12. Microbiology and virology
13. Others

1. GMP – GOOD MANUFACTURING PRACTICES

OHG has implemented food safety policies and procedures that guarantee the compliance of Good Manufacturing Practices (GMP) in all its manufacturing plants, in order to prevent the transmission of any form of contamination towards its products.

In that sense, the production and distribution processes of our films have been submitted to a systematic revision in good manufacturing practices as defined in (i.a.) (CE)1935/2004 Regulation and “GMP” (CE) 2023/2006 modified Regulation and proposed in Food and Drugs Administration Regulations (FDA), under the title 21, parts: 21 CFR 110.

2. EUROPE

EC/EU

- Regulation (EC) No. 1935/2004, Regulation (EU) No. 850/2004 (Included Regulation (EU) 2019/102) and Regulation (EU) No. 10/2011, including its amendments up to Regulation (EU) 202/2014 (Included Regulation (EU) 321/2011, Regulation (EU) 1282/2011, and Regulation (EU) 1183/2012), Regulation (EU) 174/2015, Regulation (EU) 1416/2016, Regulation (EU) 752/2017, Regulation (EU) 79/2018, Regulation (EU) 213/2018, Regulation (EU) 831/2018, Regulation (EU) 1021/2019, Regulation (EU) 37/2019 and Regulation (EU) 2020/1245 published on September 2nd 2020.
- Monomers, additives and other starting substances are listed in the Annex I of the Regulation (EU) No. 10/2011 and its 2020/1245 amendment, Regulation (EU) 1333/2008, Regulation (EU) 1334/2008.
- In accordance with Regulation (EC) No. 1935/2004 Art. 17 OHG has implemented an appropriate system which allows the traceability of their films up to the single reel.
- In accordance with Regulation (EC) No. 2023/2006 OHG films are manufactured in compliance with general rules on good manufacturing practice (GMP).
- In accordance with Statement concerning Non-intentionally added substances (NIAS): OHG has established end-to-end control systems in all of its manufacturing plants, from raw material reception to finished product shipment, which guarantees that no intentionally added substances (NIAS) are formed or introduced in any of its manufacturing plants or finished products. Likewise, OHG suppliers guarantee that any monomers and/or additives used during the manufacturing process of their products meet the criteria for the classification of substances and mixtures, in compliance with Regulation (EC) 1272/2008.

Furthermore, in accordance with:

- Italian Declaration D.P.R. 777/82 and D.M. 21/03/1973 and following modifications of Italian law up to the present date. Presidential Decree 777/82 and subsequent updates and changes.
- German Consumer Goods Regulation, Bedarfsgegenständeverordnung (BedGgstV) and their amendments.
- BFR Recommendations on food contact materials. The respective amendments are announced in the Bundesgesundheitsblatt - Gesundheitsforschung - Gesundheitsschutz (monthly federal publication on health, health research and health protection).
- Swiss Ordinance on Materials and articles in contact with food, SR 817.023.2.

3. USA

FDA/CFR

All materials and/or raw materials used are in accordance with Food and Drugs Administration Regulations (FDA) and regulations about indirect food additives from the United States of America according to the Code of Federal Regulations of E.E.U.U Drugs and Food Administration (FDA), under the title 21 (including the last rule with Federal Register 83 FR 56750 published May 20, 2022), parts:

- BOPP films coated with EVA comply with the chapter 21, CFR 177.1350(B) and the BOPP films coated with Polyethylene comply with the chapter 21, CFR 176.1620.
- Paper substrates coated with Polyethylene comply with the chapter 21, CFR 176.170 (B) y 176.180(B).

4. CANADA

CFIA/FDR

All materials and/or raw materials used are in accordance with the requirements by the Canadian Food Inspection Agency (CFIA), Division 23 of the Canadian Food and Drug Regulations (FDR), which prohibits the sale of foods in packages that may impart to the food any substance that may be injurious to human health.

CAN / CGSB Normative 32.310-2020, item 8.1.6 and 1.4 (b1 y b2), substances, materials or techniques prohibited in organic production and preparation.

Furthermore, OHG counts with a “No Objection to Use” Letter emitted by Health Canada.

5. CHINA

All materials and/or raw materials used are in accordance with the requirements listed in:

- GB9685-2016 - Additives for Food Contact Materials and Articles
- GB9685-2016. Hygienic Standard for Use of Additives in Food Containers and Packaging Materials.
- GB4806.1-2016 - General Safety Requirements for Food Contact Materials and Articles
- GB4806.6-2016 - Food Contact Use Plastic Resins
- GB4806.7-2017 – Plastic Materials and Articles

In addition, OHG guarantees compliance with the requirements stipulated by the Ministry of Health (MOH) of China regarding the use of materials for the packaging of food:

- MOH Announcement No.23-2011: 107 resins used in food packaging materials
- MOH Announcement No. 5-2012: 301 additives used in food packaging materials
- MOH Announcement No. 5-2013: 258 additives used in food packaging materials

6. JAPAN

All materials and/or raw materials used are in accordance with Japan Food Sanitation Law of 1947 (included Notification No.196 of 2020), which prohibits the sale of packaging materials containing substances that could be harmful to human health and the Ministry of Health, Labour and Welfare (MHLW) include general specifications that apply to all food packaging materials, material-specific specifications, and application-specific specifications. In addition to MHLW specifications, OHG comply with the requirements listed in:

- JHOSPA : The Japan Hygienic Olefin and Styrene Plastics Association
- JHPA : The Japan Hygienic PVC Association
- JHAVDC : The Japan Hygienic Association of Vinylidene Chloride
- JPA : The Japan Paper Association

7. MERCOSUR

All materials and/or raw materials used are in accordance with the requirements listed in:

- MERCOSUR / GMC / RES No. 03/92. General criteria for food packaging and equipment in food contact.
- MERCOSUR / GMC / RES No. 28/99. Technical regulation on the positive list for packaging and elastomeric equipment in food contact.
- MERCOSUR / GMC / RES No. 11/20. Technical regulation on positive list of additives for the production of plastic materials and polymeric coatings in food contact.

- MERCOSUR / GMS / RES No. 19/21. Technical regulation on the positive list of monomers, other starting substances and authorized polymers for the production of plastic containers and equipment in food contact.
- MERCOSUR / GMC / RES No. 20/21. General provisions for plastic packaging and equipment in food contact.

Implicitly in accordance to the following resolutions of Brazil (ANVISA):

- RESOLUTION RDC No. 51/10 Technical regulation that establishes the migration criteria for plastic materials for food packaging and equipment in food contact. Item 3.2. For total migration tests, with simulants A, B, C and D.
- RESOLUTION RDC No. 52/10 Technical regulation on dyes in packaging and equipment in food contact.
- RESOLUTION RDC No. 326/19 Technical regulation on the positive list of additives for the preparation of plastic materials and polymeric coatings destined in food contact.
- RESOLUTION RDC No. 589/21 that modified Technical regulation that approves in the positive list of monomers, other starting substances and polymers authorized for the preparation of packaging and plastic equipment in food contact. List of monomers and other authorized substances, part I.

8. PERU

All materials and/or raw materials used in our processes are in accordance with the requirements according to the norm NTP 399.163-1.2017. Plastic Packaging and Accessories in Contact with Food, Chapter 1: General Provisions and Requirements

9. COLOMBIA

All materials and/or raw materials used are in accordance with the requirements listed in:

- RESOLUTION No. 000683 of 2012 of the Ministry of Health and Social Protection, on sanitary requirements of materials, objects, containers and equipment intended to come into contact with food and beverages for human consumption.
- RESOLUTION N ° 004143 of 2012 of the Ministry of Health and Social Protection, on the technical regulation through which the sanitary requirements of materials, objects, packaging and plastic, elastomeric equipment and its additives intended to come into contact with food are indicated and drinks for human consumption.
- RESOLUTION No. 2014022808 of 2014 of the National Institute for Drug and Food Surveillance through which migration tests are established and verification of compliance with the limits of total and specific migration.

Derived from the prior mentioned Food Safety Standards, materials are in accordance with the Food Safety Requirements regarding:

10. MIGRATION OF HEAVY METALS

The materials are subject to a periodic control of Migration of Heavy Metals, and are compliant according the requirements established in the permissible limits on Migration of Heavy Metals, as part of prior mentioned regulations, including normative NTP 399.163-1.2017. Plastic Packaging and Accessories in Contact with Food, Chapter 1: General Provisions and Requirements, Section 5. Requirements Item 5.5. Part b.

11. TOTAL MIGRATION

The materials are subject to a periodic control of Total Migration, and comply with the requirements established in the permissible limits on Total Migration as part of prior mentioned regulations, including normative NTP 399.163-1.2017. Plastic Packaging and Accessories in Contact with Food, Chapter 1: General Provisions and Requirements, Section 5. Requirements Item 5.3. Part b.

12. MICROBIOLOGY AND VIROLOGY

As priory mentioned, OHG has implemented food safety policies and procedures that guarantee the compliance of good manufacturing practices (GMP) in order to prevent transmission of any form of contamination towards its products, including **microbiological** and **viral** content.

In that sense, materials are subject to a periodic control that confirm compliance according to required permissible microbiological limits, as implicitly mentioned in (i.a.) the Peruvian technical Guide for Microbiological Analysis of Surfaces in Contact with Food and Beverages approved with Ministerial Resolution N° 461-2007/MINSA, Part 8. Specific Considerations: Analytical Operations, Section 8.2. Procedure for Microbiological Control by Cotton Swab Method, Item c; Interpretation of Results According to Microbiological Limits, Inert Surfaces, Regular Surface.

13. OTHERS

HEAVY METALS (RoHs, WEEE, PACKAGING WASTE, CONEG)

Directive (EC) No. 94/62 (Including its amendments up to Directive (EU) 2013/2) and Directive (EU) 2018/852, D.L. No.152/2006. OHG films do not contain substances subject to specific restriction such as Aluminum, Arsenic, Barium, Cadmium, Chrome Hexavalent, Lead, Mercury and Selenium, USA CONEG Regulation and France: Decree No 2007-1467 of 12 October 2007 and the Environmental Code, Section 5 Packaging, Subsection 1, Articles R 543-42 to 543-52. We confirm that the films meet above mentioned legislations requirements of not containing more than 100 ppm of heavy metals.

Our films products have been manufactured in compliance with EN 13430 and EN 13431 standards.

III. MATERIAL COMPOSITION DECLARATION

1. Regulated Substances
2. Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS)
3. REACH
4. Allergens
5. ROHS
6. Ozone depleting substances

Other items

- GMM/GMO
- Animal Derivates
- Pesticides
- Recycled content

1. REGULATED SUBSTANCES

OHG declares that the following substances are not part of raw materials and not present during the manufacturing and formulation of its products:

- Adipates and Polyadipates
- Acetaldehyde CAS N° 75-07-0
- Acetylated castor oil monoglyceride (ACM)
- Acetyl tributyl citrate (ATBC) CAS N° 77-90-7
- Arsenic CAS N° 7440-38-2
- Acrylonitrile CAS N° 107-13-1
- Alkyl benzenes
- Alkyl phenols
- Alkylphenoethoxylates
- Ammonia CAS N° 7664-41-7
- Antimicrobial additives, fungicides, preservatives or fumigants
- Antimony CAS N° 7440-36-0
- Aromatic amines
- Asbestos
- Azo compounds
- Azurant optique
- Benzo[k]fluoranthene CAS N° 207-08-9
- Benzoic acid CAS N° 65-85-0
- Benzophenone CAS N° 119-61-9
- Benzyl Phenol
- Biocides
- Biphenyl-4,4'-diol CAS N° 92-88-6
- Bis phthalic anhydride of bisphenol A CAS N° 038103-06-09
- Bisphenol-A (BPA) CAS N° 80-05-7
- Bisphenol-B (BPB) CAS N° 77-40-7
- Bisphenol-F (BPF) CAS N° 620-92-8
- Bisphenol-S (BPS) CAS N° 80-09-1
- Bis(2-(2-methoxyethoxy) ethyl) ether CAS N° 143-24-8
- Black Carbon
- Boron CAS N° 7440-42-8
- Brominated flame retardants
- Butyl benzoate CAS N° 136-60-7
- Butylated Hydroxyanisole (BHA) CAS N° 25013-16-5
- Butylated Hydroxytoluene (BHT) CAS N° 128-37-0
- Calcium carbonate carbonic acid calcium salt CAS N° 471-34-1
- Carbon black CAS N° 1333-86-4
- Chlorine bleach
- Chloroalkanes C10-13 CAS N° 85535-84-8
- Chloroanisoles, bromoanisoles and derivatives
- Chlorophenol, bromophenols and derivatives

- Chlorofluorocarbons (CFC)
- Conflict Minerals:
 - ✓ Cassiterite (Tin)
 - ✓ Columbite-tantalite (Coltan, Niobium, Tantalum)
 - ✓ Gold
 - ✓ Wolframite (Tungsten)
- Cyanuric acid CAS N° 108-80-5
- Decabromodiphenylether (decaBDE) CAS N° 1163-19-5
- Di- n-octyltin thiobenzoate 2-ethylhexyl mercaptoacetate CAS N° 15231-44-4
- Di(ethylhexyl) adipate (DEHA) CAS N° 103-23-1
- Di(ethylhexyl) maleate (DEHM) CAS N° 142-16-5
- Diantimony trioxide CAS N° 1309-64-4
- Diarsenic pentaoxide CAS N° 1303-28-2
- Diarsenic trioxide CAS N° 1327-53-3
- Dibutyl sebacate (DBS) CAS N° 109-43-3,
- Diisononyl-cyclohexane-1,2-dicarboxylate (DINCH) CAS N° 166412-78-8,
- Diisopropylnaphtalene (2,6-DIPN)
- Dimethyl Fumarate (DMF) CAS N° 624-49-7
- Dinitrogen oxide CAS N° 10024-97-2
- Dioxins
- Disodium metasilicate CAS N° 6834-92-0
- Epoxidised Soya Bean Oil (ESBO) CAS N° 8013-07-8
- Epoxy derivatives:
 - ✓ BADGE [2,2-bis(4-hydroxyphenyl) propane bis(2,3-epoxypropyl) ether] CAS N° 1675-54-3
 - ✓ BFDGE [bis(hydroxyphenyl)methane bis(2,3-epoxypropyl) ether CAS N° 2095-03-6
 - ✓ NOGE [novolac glycidyl ether]

Furthermore, as defined in Directive 2002/16/EC amended by 2004/13/EC, repealed by the Regulation 1895/2005/EC

- Ethers de glycol
- Ethyl benzoate CAS N° 93-89-0
- Fluoranthene CAS N° 206-44-0
- Formaldehyde (formol) CAS N° 50-00-0
- Furans
- Halogens and their compounds:
 - ✓ Bromine
 - ✓ Chlorine
 - ✓ Fluor
- Hexabromocyclododecane (HBCD) CAS N° 25637-99-4
- Hexadecyl 3,5-Bis-Tert-Butyl-4-Hydroxybenzoate CAS N° 67845-93-6
- Hydrochlorofluorocarbons (HCFC)
- hydroxybenzophenone CAS N° 1843-05-6
- Hydrofluorocarbons (HFC)
- Isocyanates
- Isopropyltioanthone (ITX) CAS N° 83846-86-0

- Ionizing treatment
- Latexes
- Lead chromate CAS N° 7758-97-6
- Lead chromate molybdate sulphate red (CI Pigment Red 104) CAS N° 12656-85-8
- Lead sulfochromate yellow (CI Pigment Yellow 34) CAS N° 1344-37-2
- Manganese dichloride CAS N° 7773-01-5
- Melamine CAS N° 108-78-1
- Mercapto mix
- Methyl benzoate CAS N° 93-58-3
- Mixed neopentyl glycol benzoate/2- ethylhexanoate (MPBE)
- MOAH (Mineral Oil Aromatic Hydrocarbon)
- MOSH (Mineral Oil Saturated Hydrocarbon)
- Nanoparticles
- N-Ethyl-o/p-toluenesulfonamide CAS N° 8047-99-2
- N-ethyl-p-toluenesulphonamide (NE-PTSA) CAS N° 80-39-7
- N-methyl-2pyrrolidone CAS N° 872-50-4
- Nitrite de sodium CAS N° 7632-00-0
- Nitrocellulose CAS 9004-70-0
- Nitrosamine CAS N° 35576-91-1
- Nitrofurazone CAS N° 00059-87-0
- Nonylphenol and its derivatives CAS N° 25154-52-3
- Octabromodiphenyl ether CAS N° 32536-52-0
- Optical brighteners
- Organo-tin compounds:
 - ✓ Dibutyl-tin (DBT) CAS N° 1191-48-6
 - ✓ Monobutyl-tin (MBT) CAS N° 78763-54-9
 - ✓ Tributyl-tin (TBT) CAS N° 688-73-3
- Oxygen absorbers
- p-(1,1-dimethylpropyl) phenol CAS N° 80-46-6
- Palm Oil and its derivatives CAS N° 8002-75-3
- Paraben
- Parachlorobenzotrifluoride (PCBTF) CAS N° 98-56-6
- Paraffin wax CAS N° 8002-74-2
- Pentabromodiphenyl ether CAS N° 32534-81-9
- Pentachlorophenol CAS N° 87-86-5
- Pentachlorothiophenol (PCTP) CAS N° 133-49-3
- Perchlorate CAS N° 14797-73-0
- Perfluorinated tenside (PFT)
- Perfluorooctane sulfonate (PFOS) CAS N° 1763-23-1 listed in Directive 2006/122/EC
- Perfluorooctanoic acid (PFOA) CAS N° 335-67-1 listed in Directive 2006/122/EC
- Perfluorobutane sulfonic acid (PFBS)
- Phenanthrene CAS N° 85-01-8
- Phenylphenole CAS N° 90-43-7
- Phenol, isopropylated, phosphate (3:1) CAS N° 68937-41-7

- Phthalates (Ortho-Phthalates):
 - ✓ Benzyl butyl phthalate (BBP) CAS N° 85-68-7
 - ✓ Butyl decyl phthalate (BDP) CAS N° 89-19-0
 - ✓ Dibutyl phthalate (DBP) CAS N° 84-74-2
 - ✓ Diethyl phthalate (DEP) CAS N° 84-66-2
 - ✓ Dietilexilo phthalate (DEHP) CAS N° 117-81-7
 - ✓ Diundecil phthalate (DUP) CAS N° 3648-20-2
 - ✓ Di-isobutyl phthalate (DIBP) CAS N° 84-69-5
 - ✓ Di-isononyl phthalate (DINP) CAS N° 28553-12-0
 - ✓ Di-isodecyl phthalate (DIDP) CAS N° 26761-40-0
 - ✓ Di-n-octyl phthalate (DNOP) CAS N° 117-84-0
 - ✓ Diisohexyl phthalate CAS N° 71850-09-4
 - ✓ Dimethyl phthalate (dimethyl orthophthalate) CAS N° 131-11-3
 - ✓ Diphenyl phthalate CAS N° 84-62-8
 - ✓ Methyl phthalyl ethyl glycolate (1,2-Benzenedicarboxylic acid, 1-(2-ethoxy-2-oxoethyl) 2-methyl ester) CAS N° 85-71-2
 - ✓ Diphenylguanidine phthalate CAS N° 17573-13-6
 - ✓ Ethyl phthalyl ethyl glycolate (Ethyl carbethoxymethyl phthalate) CAS N° 84-72-0
 - ✓ Butyl phthalyl butyl glycolate 4 (Butyl carbobutoxymethyl phthalate) CAS N° 85-70-1
 - ✓ Dihexyl phthalate (Di-n-hexyl phthalate) CAS N° 84-75-3
 - ✓ Di(butoxyethyl) phthalate (Bis(2-n-butoxyethyl) phthalate) CAS N° 117-83-9
 - ✓ Dimethylcyclohexyl phthalate CAS N° 1322-94-7
 - ✓ Diisooctyl phthalate CAS N° 27554-26-3
 - ✓ Butyloctyl phthalate (n-butyl n-octyl phthalate) CAS N° 84-78-6
 - ✓ Di(2-ethylhexyl) hexahydrophthalate CAS N° 84-71-9
 - ✓ Amyl decyl phthalate (n-amyl n-decyl phthalate) CAS N° 7493-81-4
 - ✓ Decyl octyl phthalate (Octyldecyl phthalate/n-octyl n-decyl phthalate) CAS N° 119-07-3
 - ✓ Didecyl phthalate (Di-n-decyl phthalate) CAS N° 84-77-5
 - ✓ Dodecyl phthalate CAS N° 21577-80-0
 - ✓ Dihydroabietyl phthalate CAS N° 26760-71-4
 - ✓ Castor oil phthalate, hydrogenated CAS N° 61788-85-0
 - ✓ Castor oil phthalate with adipic acid and fumaric acid-diethylene glycol CAS N° 68650-73-7
- Poly (aromatic hydrocarbons) according to US Environmental Protection Agency Method 610 (EPA 610)
 - Polyacrylonitrile
 - Polybrominated biphenyls (PBBs)
 - Polybrominated diphenyl ethers (PBDEs)
 - Polybrominated terphenyls (PBTs)
 - Polychlorinated biphenyls (PCBs) CAS N° 1336-36-3
 - Polychlorinated naphthalenes (PCNs)

- Polychlorinated diphenyl ethers (PCDEs)
- Polychlorinated terphenyls (PCTs)
- Polyethylene Glycol (PEG) CAS N° 25322-68-3
- Polytrimethylene naphthalate (PTN) CAS N° 2877-81-9
- Polyglycolic acid (PGA) CAS N° 26124-68-5
- Polystyrene CAS N° 9003-53-6
- Polyvinyl Chloride CAS N° 9002-86-2
- Polylactic acid CAS N° 26100-51-6
- Polycarbonates
- Polyhydroxyalkanoates
- POSH (Polyolefin oligomeric saturated hydrocarbons)
- POPs (Persistent Organic Pollutants)
- Pyrene CAS N° 129-00-0
- Recycled products by Regulation (EC) 282/2008
- Semi-carbazide compounds CAS N° 57-56-7
- Silicic acid, sodium salt CAS N° 1344-09-8
- Sintered expanded polystyrene (EPS)
- Styrene CAS N° 100- 42 -5
- Short chained chlorinated paraffins
- Sodium bromide CAS N° 7647-15-6
- Sodium fluoride CAS N° 7681-49-4
- Sodium metasilicate nonahydrate CAS N° 13517-24-3
- Sodium metasilicate pentahydrate CAS N° 10213-79-3
- Synthetic latex
- Radioactive substances, as defined by Directive 96/29/Euratom (In 1223/2009)
- Tertiary Butylhydroquinone (TBHQ) CAS N° 163848-99-5
- Toluene CAS N° 108-88-3
- Thiobenzoate CAS N° 35542-25-7
- Thiuram mix
- Titanium Acetyl Acetone (TAA) CAS N° 17501-79-0
- Titanium Dioxide CAS N° 13463-67-7
- Tributyltin
- Triclosan (2,4,4'-trichloro-2'-hydroxydiphenyl ether) CAS N° 3380-34-5
- Tris(2-chloroethyl) phosphate (TCEP) CAS N° 115-96-8
- Tris(4-nonylphenyl, branched and linear) phosphite (TNPP) with $\geq 0.1\%$ w/w of 4-nonylphenol, branched and linear (4-NP) CAS N° 26523-78-4
- Tris(nonylphenyl)phosphite CAS N° 26523-78-4
- Vinyl chloride monomer (VCM) and its polymers or copolymers:
 - ✓ Polyvinylidene chloride (PVDC) CAS N° 9002-85-1
 - ✓ Chlorinated polyvinyl chloride (CPVC) CAS N° 68648-82-8
 - ✓ Vinyl chloride monomer (VCM) CAS N° 75-01-4
 - ✓ Vinyl chloride polymer (PVC) CAS N° 9002-86-2
- Vinylidene Chloride (VDC) CAS N° 75-35-4
- Vinyl chloride CAS N° 75-01-4
- Xylene CAS N° 1330-20-7
- Zinc di(acetate) CAS N° 557-34-6

- 2-ethylhexyl mercaptoacetate CAS N° 7659-86-1
- 2-isopropyl-9H-thioxanthen-9-one (2- ITX) CAS N° 5495-84-1
- 2-methyl benzophenone CAS N° 131-58-8
- 4-hydroxybenzoic acid ethyl ester CAS N° 120-47-8
- 4-hydroxybenzoic acid methyl ester CAS N° 99-76-3
- 4-hydroxybenzoic acid propyl ester CAS N° 94-13-3
- 3-hydroxybenzophenone CAS N° 13020-57-0
- 4-hydroxybenzophenone CAS N° 01137-42-4
- 1,3-butadiene CAS N° 106-99-0
- 1,7,7-trimethyl-3-(phenylmethylene)-Bicyclo[2.2.1]heptan-2-one CAS N° 15087-24-8
- 2,2-bis(4'-hydroxyphenyl)-4-methylpentane CAS N° 6807-17-6
- 2,2' Diaminodiphenyl methane (2,2' MDA) CAS N° 6582-52-1
- 2,2',2''-nitrilotriethanol CAS N° 102-71-6
- 2,3,3,3-tetrafluoro-2-(heptafluoropropoxy) propionic acid CAS N° 13252-13-6
- 2,4'-Diaminodiphenyl methane (2,4' MDA) CAS N° 1208-52-2
- 2,4-Diaminotoluene (2,4 TDA) CAS N° 95-80-7
- 2,4-dinitrotoluene (2,4-DNT) CAS N° 121-14-2
- 2,4-Di-tert-butylphenyl 3,5-di-tert-butyl-4-hydroxybenzoate CAS N° 4221-80-1
- 2,4,6-Tris(tert-butyl) phenol (2,4,6-TTBP) CAS N° 732-26-3
- 2-Ethylhexanoic Acid (2-EHA) CAS N° 149-57-5
- 2,2,4-Trimethyl-1,3-pentanediol diisobutyrate (TXIB)
- 2-Ethylhexanol esters C16/C18 (EHE)
- 2-Ethylhexyl-4-diméthylaminobenzoate (EHDAB) CAS N° 21245-02-3
- 2-Ethoxyethanol CAS N° 110-80-5
- 2-hydroxybenzophenone CAS N° 117-99-7
- 2,6-Toluenediamine (2,6-TDA) CAS N° 823-40-5
- 2-methoxyethyl acetate CAS N° 110-49-6
- 2-methoxyethanol CAS N° 109-86-4
- 2-methoxy-2-methylbutane CAS N° 994-05-8
- 2-benzyl-2-dimethylamino-4'-morpholinobutyrophenone CAS N° 119313-12-1
- 2-methyl-1-(4-methylthiophenyl)-2-morpholinopropan-1-one CAS N° 71868-10-5
- 3,5-di-tert-butyl-4-hydrobenzoic acid CAS N° 1421-49-4
- 4,4'-Methylenedianiline (MDA) CAS N° 101-77-9
- 4-hydroxybenzoic acid CAS N° 99-96-7
- 4-hydroxybenzoic acid isopropyl ester CAS N° 4191-73-5
- 4-methyl benzophenone CAS N° 134-84-9
- 4-tert-butylphenol CAS N° 98-54-4
- Substances listed in:
 - ✓ OEHHA - Chemicals List **Proposition 65** of the State of California and subsequent amendments (last updated: December 31, 2021).
 - ✓ GADSL, "Global Automotive Declarable Substance List", as amended
 - ✓ IKEA Specification, IOS-MAT-0010, chapter 3 & 6, as amended
 - ✓ IKEA Specification, IOS-MAT-0054, 2009-10-09, version AA-92520-5
 - ✓ Endocrine Disruptor Lists (List I, List II and List III) of the EU member states updated on 28th September 2021.

2. PERFLUOROALKYL AND POLYFLUOROALKYL SUBSTANCES (PFAS):

OHG declares that the following substances are not part of raw materials and not present during the manufacturing process and formulation of its products:

- Diethanolamine salts of mono- and bis (1 H, 1 H, 2 H, 2 H perfluoroalkyl) phosphates where the alkyl group is even-numbered in the range C8-C18 and the salts have a fluorine content of 52.4 percent to 54.4 percent as determined on a solid basis;
- Pentanoic acid, 4,4-bis [(gamma-omega-perfluoro-C8-20-alkyl) thio] derivatives, compounds with diethanolamine (CAS Reg. No. 71608-61-2); and
- Perfluoroalkyl substituted phosphate ester acids, ammonium salts formed by the reaction of 2,2-bis[[(gamma), [omega]-perfluoro C4-20 alkylthio) methyl]-1,3-propanediol, polyphosphoric acid and ammonium hydroxide.
- Perfluorinated tenside (PFT)
- Perfluorooctane sulfonate (PFOS) CAS N° 1763-23-1 listed in Directive 2006/122/EC
- Perfluorooctanoic acid (PFOA) CAS N° 335-67-1 listed in Directive 2006/122/EC
- Perfluorobutane sulfonic acid (PFBS)

3. REACH

The ingredients used in the production of the films supplied by OHG are already registered in ECHA, we ensure there is no intentionally added substances out of the 224 substances listed in the SVHC and its latest amendment (10 June 2022, D(2022)4187-DC Annex XIV REACH regulation) or above the limit of 0.1% as per European regulation (CE) N° 1907/2006/REACH (Amended on April 08, 2022, Regulation (EU) 2022/586) and of Annex XVII of REACH updated on April 27, 2022.

4. ALLERGENS

OHG declares that any known or potential allergens listed on the Annex II of the Regulation (EU) No 1169/2011 are not present during the manufacturing of its products, which includes:

- Cereals containing gluten, namely: wheat, rye, barley, oats, spelt, kamut or their hybridised strains, and products thereof, except:
 - o wheat based glucose syrups including dextrose (1);
 - o wheat based maltodextrins (1);
 - o glucose syrups based on barley;
 - o cereals used for making alcoholic distillates including ethyl alcohol of agricultural origin;
- Crustaceans and products thereof;
- Eggs and products thereof;
- Fish and products thereof, except:
 - o fish gelatine used as carrier for vitamin or carotenoid preparations;
 - o fish gelatine or Isinglass used as fining agent in beer and wine;

- Peanuts and products thereof;
- Soybeans and products thereof, except:
 - o fully refined soybean oil and fat (1);
 - o natural mixed tocopherols (E306), natural D-alpha tocopherol, natural D-alpha tocopherol acetate, and natural D-alpha tocopherol succinate from soybean sources;
 - o vegetable oils derived phytosterols and phytosterol esters from soybean sources;
 - o plant stanol ester produced from vegetable oil sterols from soybean sources;
- Milk and products thereof (including lactose), except:
 - o whey used for making alcoholic distillates including ethyl alcohol of agricultural origin;
 - o lactitol;
- Nuts, namely: almonds (*Amygdalus communis* L.), hazelnuts (*Corylus avellana*), walnuts (*Juglans regia*), cashews (*Anacardium occidentale*), pecan nuts (*Carya illinoensis* (Wangenh.) K. Koch), Brazil nuts (*Bertholletia excelsa*), pistachio nuts (*Pistacia vera*), macadamia or Queensland nuts (*Macadamia ternifolia*), and products thereof, except for nuts used for making alcoholic distillates including ethyl alcohol of agricultural origin;
- Celery and products thereof;
- Mustard and products thereof;
- Sesame seeds and products thereof;
- Sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/litre in terms of the total SO₂ which are to be calculated for products as proposed ready for consumption or as reconstituted according to the instructions of the manufacturers;
- Lupin and products thereof;
- Molluscs and products thereof.

5. ROHS

Substances that are listed on the Restriction of Hazardous Substances (ROHS) (2011/65/EU) list are not contained in any of our products.

- Lead
- Mercury
- Cadmium
- Hexavalent chromium
- Polybrominated biphenyls (PBB).
- Polybrominated diphenyl ethers (PBDE)

6. OZONE DEPLETING SUBSTANCES

Substances listed under Class I and Class II of the 1990 Clean Air Act are not part of raw materials and not present during the manufacturing and formulation of its products. The films, therefore, do not require labeling as set out in the rule of the Federal Register (57 FR 19166) of the 4th of May 1992.

OTHER ITEMS

GMM, GMO, NRL

Absence of genetically modified materials, i.a. Genetically Modified Microorganism (GMM), Genetically Modified Organism (GMO), NRL (Natural Rubber Latex), NR (Natural Rubber), DNR (Dry Natural Rubber), Synthetic latex.

Pesticides

We guarantee that there are no pesticides being used during our production process, neither are they present in our finished product.

Animal derivatives

According to information from our suppliers, the raw materials that contain up our films are free of substances that could cause disorders such as bovine spongiform encephalopathy (BSE) and transmissible spongiform encephalopathies (TSEs) and other substances derived from animals.

Recycled content

Our films products may contain up to a maximum of 20% reclaim/internal scrap in the core layer of the film. Our product does not use external or post-consumer recycling materials and is therefore in agreement with 2023/2006/CE.

OHG film products can be recycled as per Industry standards.

We confirm that the above information is constant in our production processes.

Sincerely,



Erik Sosa – Technical Director

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