



Label and Graphic Materials North Asia Pacific
No.608 Kunjia Road, Kunshan, Jiangsu, PRC
Zip code: 215335

COMPLIANCE STATEMENT

Date: Mar. 2nd, 2021

RE: Fasson® Adhesive HP102

Dear Valued Customer,

Thank you for your recent inquiry regarding the regulatory status of the Avery Dennison Label and Graphic Materials North Asia Pacific (LGMNAP) product/products listed above.

REACH – SVHCs and Annex XVII

As a downstream user of chemicals, LGMNAP collaborates closely with all suppliers to both achieve and maintain compliance with Regulation 1907/2006/EC (REACH). This includes ongoing monitoring of pre-registration for all substances in its products, and the registration by the set deadlines. LGMNAP laminates are considered to be articles under REACH. To fulfill the communication obligations according to Article 33 of REACH, LGMNAP notifies customers on the presence of any SVHC in the products above a concentration of 0.1% by weight of the products.

SVHC (the current list of candidates is found at <https://echa.europa.eu/candidate-list-table>) are not part of the formulation of the products mentioned above and/or do not exceed the maximum concentration level of 0.1% by weight of the products.

Annex XVII sets out a list of restrictions on the manufacture, placing on the market and use of certain dangerous chemical substances, mixtures and articles. Currently, there are 72 categories of restricted substances in REACH Annex XVII. These substances have specific restrictions and certain chemical restrictions in specific products. To the best of our current knowledge and belief, the above products meet the requirements listed under Annex XVII.

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RoHS 2.0

LGMNAP products comply with the EU Directive 2011/65/EU as amended by (EU) 2015/863 (also known as RoHS 2.0 or RoHS recast) to eliminate the use of Cadmium, Mercury, Lead and Chromium (VI), brominated flame retardants (PBBs and PBDEs), Bis(2-ethylhexyl)phthalate (DEHP), Butyl benzyl phthalate (BBP), Dibutyl phthalate (DBP) and Diisobutyl phthalate (DIBP) in electrical and electronic equipments. Based on incidental testing and/or confirmations from suppliers, the concentrations of these substances in LGMNAP products will not exceed the limits.

Heavy Metals

LGMNAP products comply with the Packaging and Packaging Waste Directive 94/62/EC, US CONEG Model Toxics legislation and Directive 2000/53/EC on end-of-life vehicles, in relation to the various heavy metals paragraphs. The requirement imposed by these pieces of legislation for heavy metals is that the sum of Cadmium, Mercury, Lead and Chromium (VI) in products should be below 100 ppm. Based on incidental testing and/or confirmations from suppliers, the concentrations of these substances in LGMNAP products will not exceed the limits.

PFOS and PFOA

PFOS and PFOA are not part of the formulation of the products mentioned above and do not exceed the concentration level of 0.005% by weight of the products.

Persistent Organic Pollutants (POPs)

LGMNAP and its suppliers do not intentionally add any substances listed in the regulations implementing "the Stockholm Protocol" (formally titled "Stockholm Protocol on Persistent Organic Pollutants") to the product mentioned above; therefore, POPs are not expected to be present in the final composition. If these substances happens to be present, it likely would be present only at a trace level.

Ozone Depleting Substances

LGMNAP and its suppliers do not intentionally add any Class I or Class II Ozone Depleting Substances listed in the regulations implementing "the Montreal Protocol" (*formally titled* **"Montreal Protocol on substances that Deplete the Ozone Layer"**) to the product mentioned above.

Dimethyl Fumarate (DMF)

LGMNAP does not intentionally add Dimethyl Fumarate (DMF) to the product listed above and it is in compliance with the EU Directive 2009/251/EC Ban on Dimethyl Fumarate.

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Conflict Minerals

LGMNAP does not use any of the regulated minerals or their derivatives as listed in the U.S. SEC Conflict Minerals regulation (Tin, Tantalum, Tungsten and Gold and/or their associated ores) in the formulation or manufacturing of any of its products or their components. This information is based upon LGMNAP's knowledge of its products and information from our suppliers.

Asbestos

LGMNAP does not intentionally add Asbestos as an ingredient to the manufacturing of the product listed above; therefore, it is not expected to be present in the final composition. If this substance happens to be present, it likely would be present only at a trace level. Because we do not routinely analyze our products for this substance, we cannot state categorically that the materials are "free" from this substance.

Polyvinyl chloride(PVC)

LGMNAP does not intentionally add Polyvinyl chloride (PVC, CAS#: 9002-86-2) as an ingredient to the manufacturing of the product listed above; therefore, it is not expected to be present in the final composition. If this substance happens to be present, it likely would be present only at a trace level. Because we do not routinely analyze LGMNAP products for this substance, we cannot state categorically that the materials are "free" from this substance.

The disclosed information referenced above is to the best of our knowledge and based on the information provided by our raw materials and component suppliers. We have not conducted testing and we recommend that you or your customer(s) make your own determination on the suitability of the products listed above for your particular application.

LGMNAP believes this information is accurate and is offered in good faith. This information is subject to revision when additional knowledge/information is gained.

Yours Sincerely,

Product Compliance
Label and Graphic Materials NAP

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