

COMPLIANCE DOCUMENTATION

LUXEFILM SCUFFPROOF® PRODUCTS

The following are included within this document:

PRODUCTS

- LuxeFilm ScuffProof Matte Thermal Laminate (LFSP)
- LuxeFilm ScuffProof Matte Thermal Laminate w/DigiBOND™ (LFHSP)
- LuxeFilm ScuffProof Matte Virgin Film (LFSV)
- LuxeFilm ScuffProof Matte Antibacterial (LFSPAB)

REGULATIONS

- California Proposition 65
- Consumer Product Safety Improvement Act (CPSIA)
- Food Contact: Regulation EU 1935/2004, EuPIA Exclusion list for printing inks and related products“ (Nov. 2012)
- Substances of Very High Concern (SVHC)
- European Inventory of Existing Chemical (EINECS)
- REACH Regulation (EC) No. 1907/2006
- Directive 94/62/EC on Packaging and Packing Waste
- European Toy Standard: Norm EN 71 Safety of Toys Part 3
- Coalition of Northwest Governors (CONEG)

ANIMAL PRODUCTS & TESTING

Source Revision Date: February 19, 2020

LuxeFilm ScuffProof products do not contain substances with animal origin, nor does our supplier conduct/commission any animal tests for any purpose.

CALIFORNIA PROPOSITION 65

Source Revision Date: February 19, 2020

LuxeFilm ScuffProof Products do not contain any substances listed in the California Proposition 65 list. All information is based on our present state of knowledge.

CONSUMER PRODUCT SAFETY IMPROVEMENT ACT (CPSIA)

Source Revision Date: July 7, 2020

After our supplier checked their formulation data, they confirm the following for the products aforementioned:

1. No lead compounds are used in the manufacture of these articles and, according to the information available to them, they do not contain > 0.009% lead. However, a presence in trace amounts due to impurities cannot be excluded.
2. The phthalates listed below are not contained > 0.1% in the formulations Di-(2-ethylhexyl)phthalate (DEHP CA3 11?-B1-T), dibutyl phthalate (DBP GAS 34-T-'4-2), Benzyl butyl phthalate (BBP CA8 85-BB-T), di-isononyl phthalate (DINP CA8 28553- 12—D or 6851540-III), di-isodecyl phthalate (DIDP CAS 68515-49-1 or 26761-4041} or DI-n-octylphthalate (DnCIP CA5 11?-B4-O}.

Refer to Disclaimer B.



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EUROPEAN TOY STANDARD EN70-3:2013

Source Revision Date: January 19, 2021

The European Toy Standard EN 71-3:2013 limits the content of certain elements such as aluminum, antimony, arsenic, barium, lead, boron, cadmium, chromium, cobalt, copper, manganese, nickel, organotin, mercury, selenium, strontium, zinc and tin in toys.

In principle, we can state that the limit values of the heavy metals mentioned (within the REACH Section of this document) are not exceeded within our products.

Furthermore, we can confirm that our products do not contain any of the following substances according to our current technical knowledge:

- Silicone oils
- MOH (Mineral Oil Hydrocarbons)
- MOSH (Mineral Oil Saturated Hydrocarbons)
- MOAH (Mineral Oil Aromatic Hydrocarbons)
- POSH (Polyolefin Oligomeric Saturated Hydrocarbons)
- Oxo-fragmentable plastics

However, ubiquitous traces, which could occur everywhere, cannot be completely excluded.

FOOD CONTACT

Source Revision Date: May 28, 2019

Indirect Food Contact: Provided that the printed side of the final product does not come directly into contact with food. Also provided the product is used according to the information provided in the Specification Sheet and is correctly processed, we hereby confirm that LuxeFilm ScuffProof Products will in principle allow compliance of the final product with the requirements of Regulation EU 1935/2004.

- LuxeFilm ScuffProof Products are manufactured in compliance with the EuPIA-GMP on “Good Manufacturing Practices for the Production of Packaging Inks formulated for use on the non-food-contact surfaces of food packaging and articles intended to come into contact with food” (3rd revised version, March 2009).
- LuxeFilm ScuffProof Products are to be used by the customer in compliance with the EC Regulation 2023/2006 (GMP) and the EuPIA Guideline “Printing Inks applied to the non-food contact surface of food packaging materials and articles” (Version of November 2011, corr. July 2012).
- All materials which are used in LuxeFilm ScuffProof Products are listed in Annex 1 (List I and II) or in Annex 6 of the Swiss Ordinance on materials and articles in contact with food (SR 817.023.21, version 01 April 2013).
- LuxeFilm ScuffProof Products comply with the EuPIA Exclusion list for printing inks and related products“ (Nov. 2012).

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Before the finished packaging is brought into circulation, we recommend preliminary tests ensuring compliance with food law. Such preliminary tests should involve appropriate methods at an accredited test laboratory.

This confirmation of the usability of LuxeFilm ScuffProof Products for the manufacture of certain food packaging does not replace the declaration of conformity for the final packaging, which has to be issued by the packaging manufacturer.

Direct Food Contact: LuxeFilm ScuffProof Products are not suitable for direct food contact applications.

This confirmation is valid for 2 years from the issue date and replaces all previous versions of this section of this document, thereby invalidating them.

REACH REGULATION (EC) NO. 1907/2006 / SUBSTANCES OF VERY HIGH CONCERN (SVHC)

Source Revision Date: January 19, 2021

Our supplier confirms that the raw material components used in these products meet the requirements of the European Inventory of Existing Chemical (EINECS), the "EuPIA Exclusion Policy for Printing Inks and Related Products" and REACH Regulation (EC) No. 1907/2006. According to REACH Regulation (EC) No. 1907/2006, our supplier is a downstream user and is not obliged to register. Our vendor's suppliers provide them exclusively with REACH-compliant raw materials. Therefore we can confirm that the lamination films produced by our supplier is in compliance with REACH Regulation (EC) No. 1907/2006.

According to the current ECHA candidate list "Substances of Very High Concern" of 19.01.2021 (<http://echa.europa.eu/de/candidate-list-table>) the films of our supplier do not contain any SVHC substances with a concentration of > 0.1 % according to our current technical knowledge and thus the conformity with REACH Regulation (EC) No. 1907/2006 is given. In addition, our products do not contain any substances subject to authorization in Annex XIV and no restricted substances in Annex XVII of REACH Regulation (EC) No. 1907/2006.

HEAVY METALS AND SPECIFIC SUBSTANCES / ROHS

Source Revision Date: July 7, 2020

The aforementioned products comply with the requirements of:

- Directive 94/62/EC on Packaging and Packing Waste
- Norm EN 71 Safety of Toys Part 3 - Migration of certain elements.
- Directive 2011/65/EU (ROHS) including amending directive 2015/863/EU.
- The heavy metals limits set by the Coalition of Northwest Governors (CONEG)

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Substances not intentionally used in the manufacture of LuxeFilm ScuffProofProducts are listed in Annex 1a. Refer to Disclaimer A.

ANNEX 1

1a) Substances not intentionally used in LuxeFilm ScuffProof Products.

Substances	CAS #
Phthalates	NA
Mineral Oil	NA
Latex	NA
Polybrominated Biphenyls (PBB)	NA
Polybrominated Diphenylethers (PBDE)	NA
Substances from genetically modified organism (GMO)	NA
Chlorinated solvents	NA
Products derived from animals	NA
Polyvinylchloride (PVC)	NA
Primary aromatic amines (PAA)	NA
Polycyclic aromatic Hydrocarbons (PAH)	NA
(per-)fluorinated substances	NA
NODGE (Novolac diglycidyl ether)	NA
Nonylphenole	NA
4-Isopropyl thioxanthone (ITX)	83846-86-0

1b) Substances not intentionally used in LuxeFilm ScuffProof Products.

Substances mentioned in Annex 1 list 1a)	N.A.
Tartrazine	1934-21-0
2-Isopropyl thioxanthone (ITX)	5495-84-1
2-Ethylhexyl-4-dimethylaminobenzoate(EHDAB)	21245-02-3
4-Methylbenzophenone (4-MBZ)	134-84-9
4,4'-Bis(dimethylamino)benzophenone (Michler's Keton)	90-94-8
Bisphenol-A (BPA)	80-05-7
Bisphenol-A- Diglycidylether (BADGE)	1675-54-3
Bisphenol-A- Diglycidyletherdiacrylate (BADGE-DA)	4687-94-9
Bisphenol-A- based raw material	NA
Bisphenol-F (BPF)	620-92-8
Bisphenol-F-Diglycidylether (BFDGE)	39817-09-9
Bisphenol-S based raw materials	NA
Benzophenone (BP)	119-61-9
2-Methylbenzophenone (2-MBZ)	131-58-8
Di-(2-ethylhexyl)phthalate (DEHP)	117-81-7
Di-n-butylphthalate (DBP)	84-74-2
Di-iso-butylphthalate(DBP)	84-69-5

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Butylbenzylphthalate (BBP)	85-68-7
Di-iso-nonylphthalate (DINP)	28553-12-0
Di-iso-decylphthalate (DIDP)	26761-40-0
Di-n-octylphthalate (DNOP)	117-84-0
Titanium Acetylacetone (TAA)	17501-79-0
2,4-Pentandion	123-54-6
Anthraquinone	84-65-1
N-vinyl caprolactam (NVC)	2235-00-9
Hexachlorobenzene	118-74-1
DodecenyI-Succinic-Anhydride	25377-73-5
Anthracene	120-12-7
Naphthalene	91-20-3

DISCLAIMER A

The raw materials used in the manufacture of LuxeFilm ScuffProof Products are technical raw materials and therefore do contain process-related additives and impurities. Therefore, the above specified confirmations are based on Material Data Sheets and other information which were made available to us by our suppliers. Additional laboratory tests on the raw materials were purchase are not conducted by us.

Responsibility Clause

The information and recommendations contained herein are based upon data believed to be up-to-date and correct. The supplier assumes no responsibility and disclaims all liability, if the damage is caused by improper use, unsuitable application purposes, and other parameters out of the supplier's sphere of influence. In using our products, customers and users must comply with all applicable health and safety laws and regulations, in particular, customers are under obligation to carry out a risk assessment for the particular work places, a safety assessment under the (EU) food contact legislation and to adequate risk management measures.

The confirmation is valid from the date of issue and replaces all previous versions of this document, thereby invalidating them.

DISCLAIMER B

This information is based on the theoretical evaluation of the composition of the products. Our supplier can provide you with this information based on the information provided by our suppliers and the knowledge gained during our production process. Our vendor does not carry out analyses of the substances mentioned. Impurities in the trace and ultra trace range of substances not intentionally added (so-called NIAS) are not taken into account.

Please note, however, that you are responsible for products manufactured from or with our products and their compliance with the requirements of applicable legal regulations.

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NOBELUS DISCLAIMER

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The information and recommendations contained herein are based upon data believed to be up-to-date and correct. Nobelus assumes no responsibility and disclaims all liability, if the damage is caused by improper use, unsuitable application purposes, and other parameters out of Nobelus sphere of influence. In using our products, customers and users must comply with all applicable health and safety laws and regulations, in particular, customers are under obligation to carry out a risk assessment for the particular work places, a safety assessment under the (EU) food contact legislation and to adequate risk management measures. Although this material may have direct and/or indirect food safety certification(s), Nobelus facilities do not claim to carry any food safety certifications.

The confirmation is valid from the date of issue and replaces all previous versions of this document, thereby invalidating them.

By following the above mentioned regulations, Nobelus has fulfilled our duty of care regarding the conformance of the products we supply with legislation governing food contact applications. It is the responsibility of the user to test the suitability of our products for the intended application. We accept no liability for losses arising from inadequate suitability of our products for the food medium being used by you.