



Chemical Policy

& Restricted Substances List (RSL)



Photo: Andrew Miller
Rider: Jeremy Jones

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1. PURPOSE AND SCOPE

The Nidecker Group is committed to developing innovative and high-performance action sport products, while reducing its environmental footprint, fulfilling social responsibility and protecting all people who play a part in the manufacturing and use of its products, including the communities along the supply chain. Balancing performance, durability and sustainability is at the heart of our business ethic.

The Nidecker Group defined this Chemical Policy, hereinafter "Nidecker Group Chemical Policy", to manage the implementation of its Restricted Substances List, hereinafter "Nidecker Group RSL", which is the complete list of restricted chemicals following this document in Appendix, in order to ban the presence or limit the use of hazardous substances in its products and production.

The Nidecker Group can only achieve this sustainable strategy through the full collaboration of our suppliers. It is critical that our suppliers commit to follow equivalent ethical business practices, and set up the foundation for trustworthy relationships between stakeholders along the life cycle of our value chain.

The Nidecker Group wants to engage all its suppliers in actively enforcing its chemical requirements.

The purpose of the Nidecker Group Chemical Policy is to define and illustrate the various chemical restrictions and standards to be followed for materials used in products and for products made for the Nidecker Group brands, as well as the handling and process flow for informing, testing and certifying the compliance with Nidecker Group standards in regard to potentially existing critical hazardous substances in production.

The document refers to all products of the following brands owned and distributed by the Nidecker Group: Nidecker, Flow, Jones, YES., Now

The Nidecker Group Chemical Policy shall apply to each and every stage of the production of all products made for the Nidecker Group. The Nidecker Group Chemical Policy is mandatory for all products and materials used in the manufacturing of products for the Nidecker Group. This applies to salesman samples, pre-production samples, and all bulk production orders.

The Nidecker Group demands from its factory partners to respect the legal standards and the Nidecker Group Chemical Policy. All factory partners shall ensure that materials, products and procedures are fully in line with this policy as well as with local laws regarding environment and products. The factory partner shall further ensure compliance with these requirements along the supply chain, including any subcontractors, in all stages of manufacturing and transformation of the materials made for products destined to the Nidecker Group.

Complementary to the Nidecker Group Chemical Policy, each supplier's obligation is to implement the Nidecker Group's Code of Conduct (CoC). Relative to the Nidecker Group Chemical Policy, the CoC contains the most important internationally recognized standards on workers' rights regarding health and safety, and the Social Compliance procedure set up by Nidecker Group.

All suppliers are expected to contribute to the Nidecker Group's efforts in monitoring and improving labour standards in their factories.

The Nidecker Group Chemical Policy does not constitute legal advice and is not a substitute for legal advice. The requirements listed herein are referring to "best practice standards" but do not necessary reflect the national laws and regulations of all the countries where products are made. It is the responsibility of individual suppliers and factories to ensure that they also meet at least all legal requirements relating to restricted-substances laws relevant for those countries.



2. INVOLVED PARTIES AND RESPONSIBILITIES/LIABILITIES

The Nidecker Group Chemical Policy aims to have a holistic approach to responsibilities along the supply chain by involving the following parties:

- Nominated material suppliers and connected factories
- Not- nominated material suppliers and/or suppliers of locally sourced materials through the assemblers
- Assembling suppliers and connected factories
- Subcontracted factories
- The Nidecker Group and its brands

The compliance with the Nidecker Group Chemical Policy shall be enforced by the Suppliers for the different stages of production. The related testing procedure and actions taken in cases of non-compliance will vary according to the status of product development and production, as well as the gravity of the breach.

All parties involved, nominated and not nominated material suppliers as well as assembling suppliers and their subcontractors, must acknowledge that they received the Nidecker Group Chemical Policy in written form and confirm that they comply with it by signing the "Nidecker Group Chemicals Policy". Any failure in complying with these requirements can result in a business relationship review and eventually removing the supplier from the list of approved partners.

3. THE NIDECKER GROUP RESTRICTED SUBSTANCES LIST (RSL)

Nidecker Group bases its RSL policy upon knowledge of applicable laws and always taking the strictest standards legislated globally and notably REACH (Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals), the US Consumer Product Safety Act (15 USC §§ 2051 et seq.), the US California Proposition 65, and the Consumer Product Safety Improvement Act (Public Law 110-314-Aug. 14, 2008), European Commission Directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment (ROHS), Biocidal Product Regulation (BPR, Regulation (EU) 528/2012) and other laws and regulations relating to the classification, packaging and labeling of dangerous substances in EEA, labels with an ecofriendly – toxic – free/sale orientation, consultation with chemical experts.

Nidecker Group requires its suppliers and business partners to legally agree to implement management processes in compliance with the requirements identified in its RSLs.

Please note that the RSL is updated regularly (typically annually) in order to keep ensure adherence with emerging and evolving regulations.

4. REACH REGULATION

The REACH Regulation (EC 1907/2006), came into force on 1 June 2007. As a European Union (EU) regulation, REACH applies directly in all Member States without the need for transposition into national legislation. It assigns the responsibility of demonstrating product safety onto those who place products on the EU market.

There are three main control instruments foreseen by REACH:

- i. Registration – the main objective is to collect chemical information on the chemicals that are on the EU market in order to implement the correct management measures of the hazards and risks associated with these chemicals.
- ii. Restriction – it restricts the marketing, use and placing on the market of certain hazardous chemicals as substances, mixtures or parts of an article.
- iii. Authorization – objective is to eliminate or effectively control risks from chemicals that are of particular concern, substances of very high concern (SVHCs). Authorization is a process divided into different stages (Candidate List, Authorization List, communication, notification and sunset date) and each stage requires different actors in a supply chain to carry out certain obligations.

All articles produced for the Nidecker Group must be compliant with all the requirements from the three main instruments in REACH: Registration, Restriction and Authorization.

8a. REACH | Candidate List of Substances of Very High Concern (SVHC)

Two hundred and five (205) substances in the Candidate List of Substances of Very High Concern (SVHC) for authorization published by European Chemicals Agency (ECHA) on and before Jan 16, 2020 regarding Regulation (EC) No 1907/2006 concerning the REACH. - According to the ruling of the Court of Justice of the European Union on the definition of an article under REACH, and the specified scope and evaluation screening, the test results of SVHC are $\leq 0.1\%$ (w/w) in the articles of the submitted sample.

Please refer to Appendix for the full list of SVHC.

These lists are under evaluation by ECHA and may subject to change in the future. Please always refer to the ECHA most up-to-date lists published here:

<http://echa.europa.eu/web/guest/candidate-list-table>

Testing:

The chemical analysis of specified SVHC must be performed by means of currently available analytical techniques against the following SVHC related documents published by ECHA:

<http://echa.europa.eu/web/guest/candidate-list-table>

REACH Instrument	Registration	Restriction	Authorization		
Chemical List	–	Annex XVII	Candidate List	Annex XIV	
Obligation	Registration	Restriction	Communication	Notification	Authorization
Legal Basis	Article 7(1)	Article 67	Article 33	Article 7(2)	Article 56
Substances Concerned	Substances intended to be released from articles	Substances included in Annex XVII	Substances included in the Candidate List	Substances included in the Candidate List	Substances included in Annex XIV
Concentration Threshold in Article	–	As per restriction condition	0.1% (w/w)	0.1% (w/w)	–
Tonnage Threshold	1 ton / year	–	–	1 ton / year	–
Entry into Force	1 June 2008	1 June 2009	28 Oct 2008	1 June 2011	1 June 2009
Who has responsibilities?	<ul style="list-style-type: none"> • Article producers • Article importers 	<ul style="list-style-type: none"> • Article producers • Article importers 	<ul style="list-style-type: none"> • Article suppliers (ie. producer, importer, distributor, retailer) 	<ul style="list-style-type: none"> • Article producers • Article importers 	<ul style="list-style-type: none"> • Article producers
Information to be submitted to...	– ECHA	–	<ul style="list-style-type: none"> • Recipient of the product • Consumer upon request within 45 days 	– ECHA	– ECHA
Are there exemptions to the obligation?	Yes	No	No	Yes	Yes



5. US CALIFORNIA PROPOSITION 65 OF THE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986

None of the products and packaging supplied to Nidecker Group shall contain any chemical(s) listed on the US California Proposition 65 list. In the event that a Prop65 chemical(s) is present in a product or packaging, the factory partner shall notify Nidecker Group prior to production and with sufficient lead-time in order to comply with the applicable labeling requirements of the law and reasonably meet target date for product launch to market. The factory partner will also commit to removing said chemical(s) from our supply chain, manufacturing processes, products, and packaging supplied to Nidecker Group as soon as reasonably achievable.

http://www.oehha.ca.gov/prop65/prop65_list/Newlist.html

6. THE CONSUMER PRODUCT SAFETY ACT (CPSA), THE CONSUMER PRODUCT SAFETY IMPROVEMENT ACT (CPSIA), AND THE CANADA CONSUMER PRODUCT SAFETY ACT (CCPSA)

Products and packaging you provide Nidecker Group shall comply with the applicable requirements of CPSA, CPSIA, and CCSPA. This includes but is not limited to the furnishing of 3rd party analytical testing reports for lead in children's products. <http://www.cpsc.gov/en/Regulations-Laws--Standards/Statutes/The-Consumer-Product-Safety-Improvement-Act/>.

<http://www.hc-sc.gc.ca/cps-spc/legislation/acts-lois/ccpsa-lcspc/index-eng.php>

Note: CPSIA requires 3rd party analytical testing for Lead, Phthalates, and Flammability in children's products.

7. USE OF BIOCIDES AND PESTICIDES

Any product provided to Nidecker Group containing a biocide or pesticide shall comply with the EU Biocidal Products Rule and US EPA regulations. These substance(s) must be approved for use by the European Chemicals Agency (ECHA) and the US EPA prior to production. Products and their packaging shall be labeled in accordance to these regulations including a claim of the biocidal product ("anti-stink," "Antimicrobial," etc.) and the name of the biocide. The manufacturer of the biocide shall provide all accurate and necessary information in order to meet these labeling requirements.

<http://echa.europa.eu/regulations>

<http://www2.epa.gov/pesticide-registration>

8. PRODUCTS AND MATERIALS INTENDED TO HAVE CONTACT WITH FOOD

Any product or material intended to have contact with food shall comply with the US FDA 21CFR 177.xxxx. Suppliers shall provide declaration(s) of compliance to this regulation to the Nidecker Group prior to production.

<http://www.fda.gov/Food/IngredientsPackagingLabeling/PackagingFCS/default.htm>

9. CHEMICALS USAGE IN MANUFACTURING PROCESSES

The Nidecker Group acknowledges and underlines that the presence of hazardous chemicals can be most appropriately managed by controlling, not only which chemicals are restricted in the products (typically managed through an RSL), but even more by regulating which chemicals are allowed to enter the production process in the first place (typically managed by sourcing "safe" chemical mixtures or by using an MRSL). It is a highly important task to control the chemistry used during all stages of the production of materials as well as in manufacturing.

All suppliers and sub-suppliers which are involved in the production process of the Nidecker Group products are encouraged to source chemicals that follow the most stringent standards of chemicals use. The preferred solution for the Nidecker Group's suppliers is to source chemical products directly either through the bluesign® bluefinder and bluesign® blueguide, or through the ZDHC Chemical Gateway. Both systems lists chemical products which have been already controlled and thus are free of certain harmful substances from the beginning.

A second solution to regulate the use of chemicals in the manufacturing process for Nidecker Group is through the use of the ZDHC Manufacturing Restricted Substances List (MRSL). An MRSL is a list of chemical substances which must be banned from intentional use in manufacturing facilities that process textile materials and trim parts in apparel, footwear, snowboard, snowboard bindings, snowboard boots and other products. The MRSL establishes acceptable concentration limits for substances in chemical formulations used within manufacturing facilities. The limits are designed to eliminate the possibility of intentional use of the listed substances. Using an MRSL requires more attention by each supplier to ensure the compliance, as opposed to sourcing already approved chemical products as described in the former paragraph.

The ZDHC Chemical Gateway is free of access and can be found here: <http://www.roadmapzero.com/gateway/>. For bluesign® bluefinder and bluesign® blueguide you can contact bluesign® directly for further information: www.bluesign.com. You can download the latest ZDHC MRSL version for free here: <http://www.roadmapzero.com/programme/manufacturing-restricted-substances-list-mrsl-conformity-guidance/>. Please note that both the lists and systems of bluesign® and ZDHC are living documents and the supplier is required to make sure that the latest version is used.

Nidecker Group further expects its business partners to ensure the reduction or elimination of contaminants present in the wastewater and sludge discharge. For this purpose Nidecker Group encourages the suppliers to test wastewater and sludge discharge according to [ZDHC Wastewater Guidelines](#).

10. CERTIFICATIONS AND EXISTING TEST REPORTS

The Nidecker Group expects its business partners to share the goal to avoid, control and monitor hazardous substances, and therefore suppliers shall be organized to do so. Each supplier shall be proactive in the environmental and chemical improvement and compliance of its products and perform verification tests.

He shall collect any certifications, material reports, MSDS and existing test reports in order to provide to the Nidecker Group proactively and also upon request.

Chemical test reports shall include at least the following information:

- Name and address of testing institute
- Report number and date
- Supplier and contact person, as well as country of supplier
- Name and code of the tested material,
- Name and code of the tested material color
- Material composition
- Hazardous substances the material has been tested for
- Test method used and Limit of Quantification (LOQ)
- Corresponding test results
- Accreditation

To be accepted by the Nidecker Group, tests need to be performed by a testing institute which has been accredited and certified in accordance with DIN/ISO/IEC 17025 – an international laboratory requirement standard to verify the laboratory competence of testing and calibration.

Nidecker Group allows testing of mixed samples of materials. Only components of similar material types are allowed to composite. Typical material types include textile, leather, coating, plastic, wood, paper, ceramic / glass.

For a composite sample, a maximum of 3 colors in one testing is allowed. Multi-color printing should be tested as one composite sample and not mixed with other samples.

A composite testing result above the tolerance limit is considered a “fail” or “preliminary fail” and separate tests will be conducted immediately.

If the supplier is a bluesign® system partner and the material is verified as bluesign® approved, then Nidecker Group considers the material compliant with the Nidecker Group RSL.

11. RSL COMPLIANCE FAILURES

If Nidecker Group receives any material or component of a product that does not meet Nidecker Group RSL requirements, the Nidecker Group will contact the supplier to start an open dialogue on how to remediate the problem. The supplier must carry out a proper investigation through a root cause analysis to specifically determine the source of failure. Until there is a pass test report for each material proving its compliance to the Nidecker Group requirements, it shall not be used in any manufacturing of Nidecker Group products.

The Nidecker Group may request a third-party audit at the production site to confirm that the non-conformity has been successfully remediated.

If Nidecker Group receives products that do not meet the RSL requirements then the supplier is expected to meet certain costs incurred in recall, litigation, rework, remanufacture and/or compensation.

12. LIST OF TESTING INSTITUTES AND CONTACT

Please note that the labs listed below are provided for your convenience only. This list is not meant to be exhaustive. To be accepted by the Nidecker Group, tests need to be performed by a testing institute which has been accredited and certified in accordance with DIN/ISO/IEC 17025 – an international laboratory requirement standard to verify the laboratory competence of testing and calibration.

UL (ITALY.InfoCRS@ul.com)

Intertek (elena.ruffino@intertek.com ; giuseppe.ruvolo@intertek.com)

Bureau Veritas (KAM Luca Galvani - luca.galvani@certest.bureauveritas.com)

SGS-CSTC Standards Technical Services Co., Ltd
SGS Center, No.143, Zhuzhou Road, Laoshan District, Qingdao, China 266101
Cary Zhang Cary.Zhang@sgs.com

13. CONTACT

For any questions regarding this Policy and RSL, please send an e-mail to xaviern@ndk.group

14. DEFINITIONS

Substance

A chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition.

Article

An object which during production is given a special shape, surface or design, which determines its function to a greater degree than does its chemical composition (fibers, textile fabrics, buttons, zippers, shoes, etc.).

Detection Limit (DL)

The method detection limit (MDL) is a measure of the smallest concentration, which can be determined with a specified precision or reproducibility and reported with 99% confidence that the analyte concentration is greater than zero and is determined from analysis of a sample in a given matrix containing the analyte.

Limit value

The intentional use of some chemical substances along the manufacturing chain is not prohibited. The limit value represents the maximum allowable amount/concentration of the respective substances which is allowable in an RSL – compliant product. The Nidecker Group Chemical Policy defines consumer safety limits for chemical substances in articles. Concentration limits are applicable to any single part, or homogeneous part, of a product.

Several

Several means, that the whole substance group is restricted although not all substances that are restricted are explicitly listed. The listed examples represent only those substances which should be considered if substance group is intended for testing.

Usage Ban

For several chemical substances or substance groups a usage ban is defined. For these substances or substance groups, any intentional use in manufacturing of articles is prohibited. That means that chemical products (e.g. colorants or textile auxiliaries) used for manufacturing of articles must not intentionally contain these substances or substance groups. The aim of a usage ban is to avoid the release of harmful substances to the environment and to avoid occurrence in the manufactured article by applying the principle. The RSL identifies an allowable trace amount of some substances due to unavoidable contamination.

ECHA

European Chemicals Agency is an agency of the European Union which manages the technical, scientific and administrative aspects of the implementation of REACH Regulation (EC) No. 1907/2006. ECHA is the driving force among regulatory authorities in implementing the EU's ground-breaking chemicals legislation for the benefit of human health and the environment as well as for innovation and competitiveness. ECHA helps companies to comply with the legislation, advances the safe use of chemicals, provides information on chemicals and addresses chemicals of concern. It is located in Helsinki, Finland.

15. TESTING - HIGH RISK OF FAILURE LIST

To provide a clear guidance for suppliers on the tests required or recommended, and to make testing prioritization more efficient, the Nidecker Group recommend to test first the list below.

1. US California Proposition 65-Lead content
2. US California Proposition 65- Phthalate content
3. Entry 63 of Commission Regulation (EU) No 836/2012 amending Annex XVII of REACH Regulation (EC) No 1907/2006 - Lead and its compounds
4. Entry 23 of Regulation (EC) No 552/2009 amending Annex XVII of REACH Regulation (EC) No 1907/2006 and its amendments Regulation (EU) No. 494/2011, Regulation (EU) 835/2012 and Regulation (EU) 2016/217- Total Cadmium
5. Commission Regulation (EU) 2018/2005 amending Entry 51 of Annex XVII to Regulation (EC) No 1907/2006-Phthalates
6. Entry 52 of Regulation (EC) No 552/2009 amending Annex XVII of REACH Regulation (EC) No 1907/2006 (previously restricted under Directive 2005/84/EC)- Phthalate
7. Entry 20 of Regulation (EC) No 276/2010 amending Annex XVII of REACH Regulation (EC) No 1907/2006 – Organostannic compounds
8. Commission Regulation (EU) No 1272/2013 amending Annex XVII of REACH Regulation (EC) No 1907/2006- Polycyclic Aromatic Hydrocarbons (PAHs)
9. SVHC screening is performed according to:
(i) Two hundred and five (205) substances in the Candidate List of Substances of Very High Concern (SVHC) for authorization published by European Chemicals Agency (ECHA) on and before Jan 16, 2020 regarding Regulation (EC) No 1907/2006 concerning the REACH.-According to the ruling of the Court of Justice of the European Union on the definition of an article under REACH, and the specified scope and evaluation screening, the test results of SVHC are \leq 0.1% (w/w) in the articles of the submitted sample.

1. US California Proposition 65- Lead content

Test method: With reference to CPSC Test Method: CPSC-CH-E1002-08.3. Analysis was performed by ICP-OES.

Test Item(s)	Limit	Unit	MDL
Lead (Pb)	100	mg/kg	20

2. US California Proposition 65- Phthalate content

Test method: With reference to CPSC-CH-C1001-09.3. Analysis was performed by GC-MS.

Test Item(s)	CAS NO.	Limit	Unit	MDL
Dibutyl Phthalate (DBP)	84-74-2	1000	mg/kg	50
Benzylbutyl Phthalate (BBP)	85-68-7	1000	mg/kg	50
Di-(2-ethylhexyl) Phthalate (DEHP)	117-81-7	1000	mg/kg	50
Diisodecyl Phthalate (DIDP)	26761-40-0/68515-49-1	1000	mg/kg	50
Di-n-hexyl Phthalate (DnHP)	84-75-3	1000	mg/kg	50
Diisononyl Phthalate (DINP)	28553-12-0/68515-48-0	1000	mg/kg	50

3. Entry 63 of Commission Regulation (EU) No 836/2012 amending Annex XVII of REACH Regulation (EC) No 1907/2006 - Lead and its compounds

Test method: With reference to CPSC-CH-E1001-08.3, analysis was performed by ICP-OES.

Test Item(s)	Limit	Unit	MDL
Lead (Pb)	500	mg/kg	20

4. Entry 23 of Regulation (EC) No 552/2009 amending Annex XVII of REACH Regulation (EC) No 1907/2006 and its amendments Regulation (EU) No. 494/2011 , Regulation (EU) 835/2012 and Regulation (EU) 2016/217- Total Cadmium

Test method: With reference to EN 1122: 2001 Method B , analysis was performed by ICP-OES.

Test Item(s)	Limit	Unit	MDL
Cadmium (Cd)	0.01	%	0.0005

5. Commission Regulation (EU) 2018/2005 amending Entry 51 of Annex XVII to Regulation (EC) No 1907/2006-Phthalates

Test method: With reference to EN 14372: 2004, analysis was performed by GC-MS.

Test Item(s)	Limit	Unit	MDL
Di-butyl Phthalate (DBP)	-	%	0.003
Benzyl Butyl Phthalate (BBP)	-	%	0.003
Di-2-Ethyl Hexyl Phthalate (DEHP)	-	%	0.003
Diisobutyl Phthalates (DIBP)	-	%	0.003
Total(DBP+BBP+DEHP+DIBP)	0.1	%	-

6. Entry 52 of Regulation (EC) No 552/2009 amending Annex XVII of REACH Regulation (EC) No 1907/2006 (previously restricted under Directive 2005/84/EC)-Phthalate

Test method: With reference to EN 14372: 2004, analysis was performed by GC-MS.

Test Item(s)	CAS NO.	Limit	Unit	MDL
Diisononyl Phthalate (DINP)	28553-12-0/68515-48-0	-	%	0.010
Di-n-octyl Phthalate (DNOP)	117-84-0	-	%	0.003
Diisodecyl Phthalate (DIDP)	26761-40-0/68515-49-1	-	%	0.010
Total (DINP+DNOP+DIDP)		0.1	%	-

7. Entry 20 of Regulation (EC) No 276/2010 amending Annex XVII of REACH Regulation (EC) No 1907/2006 – Organostannic compounds

Test method: With reference to AfPS GS 2014:01 PAK, analysis was performed by GC-MS.

Test Item(s)	Limit	Unit	MDL
Σ of Tri substituted organotin compounds calculated as tin*	0.1	%	0.01
Dibutyl tin (DBT) by weight of Tin	0.1	%	0.01
Diocetyl tin (DOT) by weight of Tin	0.1	%	0.01

8. Commission Regulation (EU) No 1272/2013 amending Annex XVII of REACH Regulation (EC) No 1907/2006- Polycyclic Aromatic Hydrocarbons (PAHs)

Test method: With reference to AfPS GS 2014:01 PAK, analysis was performed by GC-MS.

Test Item(s)	Limit	Unit	MDL
Benzo(a)anthracene(BaA)	1.0	mg/kg	0.1
Chrysene(CHR)	1.0	mg/kg	0.1
Benzo(k)fluoranthene(BkF)	1.0	mg/kg	0.1
Benzo(e)pyrene(BeP)	1.0	mg/kg	0.1
Benzo(a)pyrene(BaP)	1.0	mg/kg	0.1
Dibenzo(a,h)anthracene(DBA)	1.0	mg/kg	0.1
Benzo(b)fluoranthene(BbF)	1.0	mg/kg	0.1
Benzo(j)fluoranthene(BjF)	1.0	mg/kg	0.1

16. NIDECKER GROUP CHEMICAL POLICY - DECLARATION OF CONFORMITY

All key factory partners of the Nidecker Group shall comply with the requirements of the Nidecker Group Chemical Policy. By signing hereunder, the factory partner acknowledges the receipt of the Nidecker Group Chemical Policy and confirms their compliance with it in order to control and monitor hazardous substances throughout the manufacturing processes. The factory partner acknowledges their responsibility to ensure the compliance with the Nidecker Group Chemical Policy at any step of the manufacturing of the Nidecker Group's products and to pass on the documents to any business/factory partners involved in the production process. This includes any nominated and non-nominated (local) material suppliers, as well as assembling suppliers and subcontracted factories.

With the signature the mentioned parties certify that the products delivered to the Nidecker Group, including any steps or parts done by manufacturers/assemblers/subcontractors making materials or products for the Nidecker Group through the signatory party, will be free of all banned hazardous substances or within the threshold limits for limited substances as defined in the Nidecker Group RSL.

Following the signature and their commitment to these principles, our suppliers shall maintain appropriate records to demonstrate compliance with the requirements of this code and will make these available to Nidecker Group upon request at any time.

Signature

Name of the supplier _____

Person of contact _____
(name and function)

Email _____

Date _____

Signature _____



17. APPENDIX | SVHC LIST

This list is under evaluation by ECHA and may be subject to change in the future.

Please always refer to the ECHA most up-to-date lists published here:

<http://echa.europa.eu/web/guest/candidate-list-table>

Substance Name	CAS No.
4,4' -Diaminodiphenylmethane(MDA)	101-77-9
5-tert-butyl-2,4,6-trinitro-m-xylene (musk xylene)	81-15-2
Alkanes, C10-13, chloro (Short Chain Chlorinated Paraffins)	85535-84-8
Anthracene	120-12-7
Benzyl butyl phthalate (BBP)	85-68-7
Bis (2-ethylhexyl)phthalate (DEHP)	117-81-7
Bis(tributyltin)oxide (TBTO)	56-35-9
Cobalt dichloride*	7646-79-9
Diarsenic pentaoxide*	1303-28-2
Diarsenic trioxide*	1327-53-3
Dibutyl phthalate (DBP)	84-74-2
Hexabromocyclododecane (HBCDD) and all major diastereoisomers identified (α -HBCDD, β -HBCDD, γ -HBCDD) Δ	25637-99-4, 3194-55-6
Lead hydrogen arsenate*	7784-40-9
Sodium dichromate*	7789-12-0, 10588-01-9
Triethyl arsenate*	15606-95-8
2,4-Dinitrotoluene	121-14-2
Acrylamide	65532
Anthracene oil**	90640-80-5
Anthracene oil, anthracene paste**	90640-81-6
Anthracene oil, anthracene paste, anthracene fraction**	91995-15-2
Anthracene oil, anthracene paste, distn. lights**	91995-17-4
Anthracene oil, anthracene-low**	90640-82-7
Diisobutyl phthalate	84-69-5
Lead chromate molybdate sulphate red (C.I. Pigment Red 104)*	12656-85-8
Lead chromate*	7758-97-6
Lead sulfochromate yellow (C.I. Pigment Yellow 34)*	1344-37-2
Pitch, coal tar, high temp.**	65996-93-2
Tris(2-chloroethyl)phosphate	115-96-8
Ammonium dichromate*	7789-09-5
Boric acid*	10043-35-3, 11113-50-1
Disodium tetraborate, anhydrous*	1303-96-4, 1330-43-4, 12179-04-3
Potassium chromate*	7789-00-6
Potassium dichromate*	7778-50-9
Sodium chromate*	7775-11-3
Tetraboron disodium heptaoxide, hydrate*	12267-73-1

Substance Name	CAS No.
Trichloroethylene	79-01-6
2-Ethoxyethanol	110-80-5
2-Methoxyethanol	109-86-4
Chromic acid, Oligomers of chromic acid and dichromic acid, Dichromic acid*	7738-94-5, -, 13530-68-2
Chromium trioxide*	1333-82-0
Cobalt(II) carbonate*	513-79-1
Cobalt(II) diacetate*	71-48-7
Cobalt(II) dinitrate*	10141-05-6
Cobalt(II) sulphate*	10124-43-3
1,2,3-trichloropropane	96-18-4
1,2-Benzenedicarboxylic acid, di-C6-8-branched alkyl esters, C7-rich	71888-89-6
1,2-Benzenedicarboxylic acid, di-C7-11-branched and linear alkyl esters	68515-42-4
1-methyl-2-pyrrolidone	872-50-4
2-ethoxyethyl acetate	111-15-9
Hydrazine	7803-57-8, 302-01-2
Strontium chromate*	7789-06-2
1,2-Dichloroethane	107-06-2
2,2'-dichloro-4,4'-methylenedianiline	101-14-4
2-Methoxyaniline; o-Anisidine	90-04-0
4-(1,1,3,3-tetramethylbutyl)phenol	140-66-9
Aluminosilicate Refractory Ceramic Fibres *	650-017-00-8 (Index no.)
Arsenic acid*	7778-39-4
Bis(2-methoxyethyl) ether	111-96-6
Bis(2-methoxyethyl) phthalate	117-82-8
Calcium arsenate*	7778-44-1
Dichromium tris(chromate) *	24613-89-6
Formaldehyde, oligomeric reaction products with aniline	25214-70-4
Lead diazide, Lead azide*	13424-46-9
Lead dipicrate*	6477-64-1
Lead styphnate*	15245-44-0
N,N-dimethylacetamide	127-19-5
Pentazinc chromate octahydroxide*	49663-84-5
Phenolphthalein	77-09-8
Potassium hydroxyoctaoxidizincatedichromate*	11103-86-9
Trilead diarsenate*	3687-31-8
Zirconia Aluminosilicate Refractory Ceramic Fibres*	650-017-00-8 (Index no.)

Substance Name	CAS No.
[4-[[4-anilino-1-naphthyl][4-(dimethylamino)phenyl]methylene]cyclohexa-2,5-dien-1-ylidene] dimethylammonium chloride (C.I. Basic Blue 26)§	2580-56-5
[4-[4,4'-bis(dimethylamino)benzhydrylidene]cyclohexa-2,5-dien-1-ylidene]dimethylammonium chloride (C.I. Basic Violet 3)§	548-62-9
1,2-bis(2-methoxyethoxy)ethane (TEGDME; triglyme)	112-49-2
1,2-dimethoxyethane; ethylene glycol dimethyl ether (EGDME)	110-71-4
4,4'-bis(dimethylamino) benzophenone (Michler's Ketone)	90-94-8
4,4'-bis(dimethylamino)-4''-(methylamino)trityl alcohol§	561-41-1
Diboron trioxide*	1303-86-2
Formamide	75-12-7
Lead(II) bis(methanesulfonate)*	17570-76-2
N,N,N',N'-tetramethyl-4,4'-methylenedianiline (Michler's base)	101-61-1
TGIC (1,3,5-tris(oxiranylmethyl)-1,3,5-triazine-2,4,6-(1H,3H,5H)-trione)	2451-62-9
α,α-Bis[4-(dimethylamino)phenyl]-4-(phenylamino)naphthalene-1-methanol (C.I. Solvent Blue 4)§	6786-83-0
β-TGIC (1,3,5-tris[(2S and 2R)-2,3-epoxypropyl]-1,3,5-triazine-2,4,6-(1H,3H,5H)-trione)	59653-74-6
[Phthalato(2-)]dioxotrilead*	69011-06-9
1,2-Benzenedicarboxylic acid, dipentylester, branched and linear	84777-06-0
1,2-Diethoxyethane	629-14-1
1-Bromopropane	106-94-5
3-Ethyl-2-methyl-2-(3-methylbutyl)-1,3-oxazolidine	143860-04-2
4-(1,1,3,3-tetramethylbutyl)phenol, ethoxylated	-
4,4'-Methylenedi-o-toluidine	838-88-0
4,4'-Oxydianiline and its salts	101-80-4
4-Aminoazobenzene	60-09-3
4-Methyl-m-phenylenediamine	95-80-7
4-Nonylphenol, branched and linear	-
6-Methoxy-m-toluidine	120-71-8
Acetic acid, lead salt, basic*	51404-69-4
Biphenyl-4-ylamine	92-67-1
Bis(pentabromophenyl) ether (DecaBDE)	1163-19-5
Cyclohexane-1,2-dicarboxylic anhydride, cis-cyclohexane-1,2-dicarboxylic anhydride, trans-cyclohexane-1,2-dicarboxylic anhydride	85-42-7, 13149-00-3, 14166-21-3
Diazene-1,2-dicarboxamide (C,C'-azodi(formamide))	123-77-3
Dibutyltin dichloride (DBTC)	683-18-1
Diethyl sulphate	64-67-5
Diisopentylphthalate	605-50-5
Dimethyl sulphate	77-78-1

Substance Name	CAS No.
Dinoseb	88-85-7
Dioxobis(stearato)trilead*	12578-12-0
Fatty acids, C16-18, lead salts*	91031-62-8
Furan	110-00-9
Henicosaflluoroundecanoic acid	2058-94-8
Heptacosaflluorotetradecanoic acid	376-06-7
Hexahydromethylphthalic anhydride, Hexahydro-4-methylphthalic anhydride, Hexahydro-1-methylphthalic anhydride, Hexahydro-3-methylphthalic anhydride	☆
Lead bis(tetrafluoroborate)*	13814-96-5
Lead cyanamidate*	20837-86-9
Lead dinitrate*	10099-74-8
Lead monoxide*	1317-36-8
Lead oxide sulfate*	12036-76-9
Lead tetroxide (orange lead)*	1314-41-6
Lead titanium trioxide*	12060-00-3
Lead titanium zirconium oxide*	12626-81-2
Methoxyacetic acid	625-45-6
Methyloxirane (Propylene oxide)	75-56-9
N,N-dimethylformamide	68-12-2
N-Methylacetamide	79-16-3
N-Pentyl-isopentylphthalate	776297-69-9
o-Aminoazotoluene	97-56-3
o-Toluidine	95-53-4
Pentacosaflluorotridecanoic acid	72629-94-8
Pentalead tetraoxide sulphate*	12065-90-6
Pyrochlore, antimony lead yellow*	8012-00-8
Silicic acid, barium salt, lead-doped*	68784-75-8
Silicic acid, lead salt*	11120-22-2
Sulfurous acid, lead salt, dibasic*	62229-08-7
Tetraethyllead*	78-00-2
Tetralead trioxide sulphate*	12202-17-4
Tricosaflluorododecanoic acid	307-55-1
Trilead bis(carbonate)dihydroxide (basic lead carbonate)*	1319-46-6
Trilead dioxide phosphonate*	12141-20-7
4-Nonylphenol, branched and linear, ethoxylated	-
Ammonium pentadecafluorooctanoate (APFO)**	3825-26-1
Cadmium oxide*	1306-19-0
Cadmium*	7440-43-9
Dipentyl phthalate (DPP)	131-18-0
Pentadecafluorooctanoic acid (PFOA)	335-67-1
Cadmium sulphide*	1306-23-6

Substance Name	CAS No.
Dihexyl phthalate	84-75-3
Disodium 3,3'-[[1,1'-biphenyl]-4,4'-diylbis(azo)]bis(4-aminonaphthalene-1-sulphonate) (C.I. Direct Red 28)	573-58-0
Disodium 4-amino-3-[[4'-[(2,4-diaminophenyl)azo][1,1'-biphenyl]-4-yl]azo]-5-hydroxy-6-(phenylazo)naphthalene-2,7-disulphonate (C.I. Direct Black 38)	1937-37-7
Imidazolidine-2-thione; 2-imidazoline-2-thiol	96-45-7
Lead di(acetate)*	301-04-2
Trixylyl phosphate	25155-23-1
1,2-Benzenedicarboxylic acid, dihexyl ester, branched and linear	68515-50-4
Cadmium chloride*	10108-64-2
Sodium perborate; perboric acid, sodium salt*	-
Sodium peroxometaborate*	7632-04-4
2-(2H-benzotriazol-2-yl)-4,6-ditertpentylphenol (UV-328)	25973-55-1
2-benzotriazol-2-yl-4,6-di-tert-butylphenol (UV-320)	3846-71-7
2-ethylhexyl 10-ethyl-4,4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate (DOTE)	15571-58-1
Cadmium fluoride*	7790-79-6
Cadmium sulphate*	10124-36-4, 31119-53-6
Reaction mass of 2-ethylhexyl 10-ethyl-4,4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate & 2-ethylhexyl 10-ethyl-4-[[2-[(2-ethylhexyl)oxy]-2-oxoethyl]thio]-4-octyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate (reaction mass of DOTE & MOTE)	-
1,2-benzenedicarboxylic acid, di-C6-10-alkyl esters; 1,2-benzenedicarboxylic acid, mixed decyl and hexyl and octyl diesters with ≥ 0.3% of dihexyl phthalate	68515-51-5, 68648-93-1
5-sec-butyl-2-(2,4-dimethylcyclohex-3-en-1-yl)-5-methyl-1,3-dioxane [1], 5-sec-butyl-2-(4,6-dimethylcyclohex-3-en-1-yl)-5-methyl-1,3-dioxane [2] [covering any of the individual isomers of [1] and [2] or any combination thereof]	-
1,3-propanesultone	1120-71-4
2,4-di-tert-butyl-6-(5-chlorobenzotriazol-2-yl)phenol (UV-327)	3864-99-1
2-(2H-benzotriazol-2-yl)-4-(tert-butyl)-6-(sec-butyl)phenol (UV-350)	36437-37-3
Nitrobenzene	98-95-3

Substance Name	CAS No.
Perfluorononan-1-oic-acid and its sodium and ammonium salts	375-95-1, 21049-39-8, 4149-60-4
Benzo[def]chrysene (Benzo[a]pyrene)	50-32-8
4,4'-isopropylidenediphenol (bisphenol A)	80-05-7
4-Heptylphenol, branched and linear	-
Nonadecafluorodecanoic acid (PFDA) and its sodium and ammonium salts	3108-42-7, 335-76-2, 3830-45-3
p-(1,1-dimethylpropyl)phenol	80-46-6
Perfluorohexane-1-sulphonic acid and its salts	-
1,6,7,8,9,14,15,16,17,17,18,18-Dodecachloropentacyclo[12.2.1.16,9.02,13.05,10]octadeca-7,15-diene ("Dechlorane Plus" [™]) [covering any of its individual anti- and syn-isomers or any combination thereof]	-
Benz[a]anthracene	56-55-3, 1718-53-2
Cadmium nitrate*	10022-68-1, 10325-94-7
Cadmium carbonate*	513-78-0
Cadmium hydroxide*	21041-95-2
Chrysene	218-01-9, 1719-03-5
Reaction products of 1,3,4-thiadiazolidine-2,5-dithione, formaldehyde and 4-heptylphenol, branched and linear (RP-HP) [with ≥0.1% w/w 4-heptylphenol, branched and linear]	-
Benzene-1,2,4-tricarboxylic acid 1,2-anhydride (trimellitic anhydride) (TMA)	552-30-7
Benzo[ghi]perylene	191-24-2
Decamethylcyclopentasiloxane (D5)	541-02-6
Dicyclohexyl phthalate (DCHP)	84-61-7
Disodium octaborate*	12008-41-2
Dodecamethylcyclohexasiloxane (D6)	540-97-6
Ethylenediamine(EDA)	107-15-3
Lead*	7439-92-1
Octamethylcyclotetrasiloxane (D4)	556-67-2
Terphenyl, hydrogenated	61788-32-7
1,7,7-trimethyl-3-(phenylmethylene)bicyclo[2.2.1]heptan-2-one (3-benzylidene camphor)	15087-24-8
2,2-bis(4'-hydroxyphenyl)-4-methylpentane	6807-17-6
Benzo[k]fluoranthene	207-08-9

Substance Name	CAS No.
Fluoranthene	206-44-0, 93951-69-0
Phenanthrene	85-01-8
Pyrene	129-00-0, 1718-52-1
2,3,3,3-tetrafluoro-2-(heptafluoropropoxy)propionic acid, its salts and its acyl halides (covering any of their individual isomers and combinations thereof)	-
2-methoxyethyl acetate	110-49-6
4-tert-butylphenol (PTBP)	98-54-4
Tris(4-nonylphenyl, branched and linear) phosphite (TNPP) with $\geq 0.1\%$ w/w of 4-nonylphenol, branched and linear (4-NP)	-
2-benzyl-2-dimethylamino-4'-morpholinobutyrophenone	119313-12-1
2-methyl-1-(4-methylthiophenyl)-2-morpholinopropan-1-one	71868-10-5
Diisohexyl phthalate	71850-09-4
Perfluorobutane sulfonic acid (PFBS) and its salts	-