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SIMONA® semi-finished parts Implementation of REACH

Dear Sir or Madam,

In terms of the implementation of REACH we wish to inform you as follows:

The product range of SIMONA® includes semi-finished products, pipes and fittings, that consist of polymeric materials. According to the REACH directive (1907/2006/EU and the latest amendment (EU) 2023/923), polymers do not have to pass through the REACH process like chemicals, i.e. pre-registration, registration etc. The REACH directive applies to chemicals and preparations - polymers are explicitly excluded.

As a downstream user within the supply chain as described under REACH, we ensure that our suppliers handle all substances which they deliver to us in accordance with the REACH regulations.

It is not expected that any of our SIMONA® products will be taken out of our range due to the REACH directive. If the availability of single raw materials will be constricted due to REACH, alternative and REACH-conform raw materials will be used.

According to our knowledge, it is not necessary to consider individual applications in which our products will be used, because for us as a manufacturer of semi-finished products it is not possible to register our products. In fact we have to assure that our raw material suppliers consider "our" application (= manufacturing semi-finished products, pipes and fittings) when (pre-) registering their raw materials.

The SCIP database (**S**ubstances of **C**oncern In articles as such or in complex objects (**P**roducts)) is an electronic database of the European Chemicals Agency (ECHA) that contains information on substances of very high concern in products or in complex objects. As of January 5, 2021, companies that supply products to the EU market that contain substances of very high concern (SVHC) in a concentration of more than 0.1 percent by weight must provide information about these products and which SVHC they contain to ECHA. In case of a complex object, this threshold applies to each of the products that are connected/put together to form the complex object.

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We confirm that our products comply with Annex XVII (acc. To Article 67) of Regulation EC No. 1907/2006 in terms of ingredients and scope.

We further confirm that our products (except for specified below) do not contain any of the substances listed in the Candidate List of Substances of Very High Concern (SVHC), latest release on 14.06.2023 by ECHA, in the relevant concentration of >0.1% (w/w).

Duty to inform according to Article 33 of the REACH Regulation (EC No. 1907/2006.):

The following PVC types contains more than 0.1% of the following substance and are listed in SCIP:

- Dioctyltin derivates (DOTE)

| SCIP-Referenznummer | SIMONA® Product |
|--------------------------------------|---|
| bc947791-654e-4e10-91f1-8934d46c4083 | PVC-foam (all COPLAST and all SIMOPOR-types) |
| a9fbe5ca-0505-4def-b1df-03f51c99f8a5 | PVC-U welding rod (all PVC-CAW, PVC-MZ COLOR and PVC-C welding rods) |
| 788557b9-946b-4400-b46e-1a50ed8ee392 | extruded PVC-U sheet thinner than 15mm thickness (all PVC-CAW, PVC-MZ COLOR and PVC-C sheets) |

We hope we had been of assistance to you. Please do not hesitate to contact us for further information needed.

Kind regards

Dr. Wolfgang Frings

Head of Research and Development

Mathias Conrad

Technical Service Center (TSC)

CAS number: 15571-58-1