



WITTENBURG

G R O U P

Product Stewardship Bulletin (PSB) for Witcom and Cawiton grades 1. REACH and SVHC; 2. RoHS (June 2020)

1. REACH and Substances of Very High Concern (SVHC); Annex XIV; Annex XVII

The REACH legislation 1907/2006/EC, dealing with the Registration, Evaluation and Authorization of Chemicals, entered into force on June 1, 2007 and required manufacturers and/or importers to preregister and/or register chemical substances in accordance with the procedures and timelines prescribed within the Regulation. As a typical Downstream User and a manufacturer of "preparations", Wittenburg Group has closely cooperated with the raw material suppliers to ensure continuity of supply of Wittenburg Group compounded products. Since our Witcom and Cawiton compounds are considered preparations, they are not subject to registration under REACH. Also the main ingredients in our formulations are polymers, which are exempted from registration.

Herewith we can confirm that to the best of our knowledge, our raw material suppliers (manufacturers or importers) have met REACH registration requirements, including the May 31, 2018 deadline for the materials produced or imported in volumes > 1 TPA. At the same time we hereby confirm that Wittenburg Group do not intentionally use any of the following substances:

- Substances of Very High Concern (SVHC) as listed by ECHA in the SVHC candidate list in concentrations above 0.1% by weight in Cawiton compounds (containing 209 substances, latest update **June 25, 2020**)
- SVHC Substances included in REACH Annex XIV authorization list (containing 54 substances, as updated per **May 27, 2020**)
- REACH Annex XVII Restricted Substances (as amended).

2. RoHS Compliance (2011/65/EC, amending 2002/95/EC) and Commission Delegated Directive 2015/863/EC, amending Annex II of Directive 2011/65/EC.

Wittenburg Group do not intentionally add any lead, cadmium, mercury, hexavalent chromium, polybrominated biphenyls and/or polybrominated diphenyl ethers during the manufacturing process of our compounds. The statement includes the brominated flame retardants pentabromodiphenyl ether and octabromodiphenyl ether and applies to the following categories of substances:

- **Hexavalent chromium compounds < 0.1%**
- **Cadmium and its compounds < 0.01%**
- **Mercury and its compounds < 0.1%**
- **Lead and its compounds < 0.1%**
- **Polybrominated diphenyl ethers (PBDEs) < 0.1%**
- **Polybrominated biphenyls (PBBs) < 0.1%**
- **Pentabromodiphenyl ether < 0.1%**
- **Octabromodiphenyl ether < 0.1%**
- **Decabromodiphenyl ether < 0.1%**
- **Bis(2-ethylhexyl) phthalate (DEHP) < 0.1%**
- **Butyl benzyl phthalate (BBP) < 0.1%**
- **Dibutyl phthalate (DBP) < 0.1 %**
- **Diisobutyl phthalate (DIBP) < 0,1 %**

Furthermore, based upon our knowledge of the manufacturing process and information provided by our raw material suppliers, we would not expect these substances to be present in our final product. Analysis for these chemicals is not routinely performed on our final products, however.

Product Stewardship & Regulatory Affairs Wittenburg Group