

شركة الصحراء العالمية للبتروكيماويات

(شركة مساهمة سعودية)

Sahara International Petrochemical Company (Saudi Joint Stock Company)



DECLARATION OF COMPLIANCE CERTIFICATE

Ethylene Vinyl Acetate Copolymers (EVA) / CAS 24937-78-8



ABSTRACT

This Declaration of Compliance Certificate is owned by the Compliance and Product Stewardship Department which covers the EU Regulation / Directive, FDA, FCM, CLP, GHS and other legislation related to health, safety and environment concerns.

Mustafa Fatani

Prepared By

Dr. Richard Tomanek

Approved By

SAHARA INTERNATIONAL PETROCHEMICAL CO.

APPROVED

Compliance & Product Stewardship Dept.

Updated on August 2021

Sahara International Petrochemical Company (Saudi Joint Stock Company)

Declaration of Compliance Certificate

To Whom It May Concern,

Sahara International Petrochemical Company (SIPCHEM) declares that Ethylene Vinyl Acetate Copolymers product is manufactured and formulated in accordance with the compositional requirements to meet and comply with the following list of regulations.

Note: FDA and food contact regulation are applicable for food grades only

(EVA 2518 CO, EVA 0818 LO, EVA 2014 CO)

Sipchem hereby confirms that will notify and declare about the following changes to manufacturing process that could affect the quality, safety & efficacy of the product supplied, prior to implementation. (Change of manufacturing site / major changes to the manufacturing facility, Change of Equipment, Major changes in the manufacturing process or synthetic route, Changes to the specification or method of analysis and Change of Packaging, Storage& Packaging conditions).

Note:

Contact complianceps@sipchem.com for more information.



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REACH

• Vinyl Acetate Monomer (VAM) REACH reg. no.: 01-2119471301-50-0060.

Above mentioned raw material is used in EVA manufacturing and registered for REACH.

EVA product is free from the restricted substances under REACH Annex XVII list.

Therefore, EVA product is exempted from the provision on registration on title of REACH (Article 2 (9)).

Food Contact EU

EVA product complies with the following regulation list:

- Framework Regulation (EC) 1935/2004.
- Commission Regulation (EU) 2020/1245 of 2 September 2020 amending and correcting Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food.
- Commission Regulation (EC) No 2023/2006 of 22 December 2006 on good manufacturing practice for materials and articles intended to come into contact with food.
- Regulation 21CFR177.1350 Substances for Use as Basic Components of Single and Repeated Use Food Contact Surfaces.

Specific Migration Limit of (Ethylene Monomer CAS 74-85-1, Vinyl Acetate Monomer CAS 108-05-4, Propylene CAS 115-07-1 & Phenolic Antioxidant CAS 2082-79-3) are (60, 12, 60 & 6) ppm respectively.

Food Contact - China

EVA product complies with the Chinese Standards GB9685-2016, GB4806.1-2016 and GB4806.6-20161. where Vinyl Acetate Monomer SML is 12 ppm.

Halal Certificate

EVA product is manufactured in a standard industrial process without the use of any animal derived additives nor Non-Halal chemicals. Therefore, we confirm that our EVA product can be considered as compliant with Halal principles.

SVHC

EVA product is not included nor intentionally added chemicals listed in the Substances of Very High Concern (SVHC) during manufacturing process based on the latest update by ECHA 08 July 2021. Ref.

· C.R. 2055007570

Capital: SR 7,333,333,320

س.ت .۷۵۷.۰۵۰.

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California Proposition 65

EVA product complies with California Proposition 65 (updated on December 18, 2020). The product represents 'no significant risk' for cancer to the people of California. The product contains no substances known to the State of California to cause reproductive toxicity at a level of exposure subject to the requirements of Propositions 65. Ref.

Shelf Life

The maximum allowable recommended shelf life for EVA is 6 years when stored at ambient conditions recommended in the SDS:

- Store in a cool, dry place with temperature below 75° F
- Keep away from direct heat or open flames.
- Avoid contact with solvents or other fluids.
- Do not store in direct sunlight.
- Keep products wrapped or sealed to minimize the absorption of moisture.
- Store in a relaxed condition free from tension, compression or other deformation.

Mercosur

(Argentina, Brazil, Uruguay, Paraguay, Venezuela and Bolivia)

EVA product meets the requirements of following regulations:

- GMC Resolution No. 03/1992 of April 1st, 1992, which "establishes the general criteria and classification of materials for packaging and equipment in contact with food".
- GMC Resolution No. 02/2012 of April 19th, 2012 which provides a "positive list of monomers, other starting substances and polymers authorized for the manufacture of plastic packaging and equipment that come into contact with food".
- GMC Resolution No. 32/2007 of December 11th, 2007 which provides a "positive list of additives for plastic materials intended for packaging and equipment manufacturing for contact with foods.

RoHS

EVA product complies with the Restriction of Hazardous Substances Directive where none of the following substance are intentionally added to the process. (Cadmium, Lead, Mercury, Hexavalent Chromium, Polybrominated Biphenyls, Polybrominated Diphenyl Ethers, Bis(2-ethylhexyl) phthalate, Butyl benzyl phthalate, Dibutyl phthalate & Diisobutyl phthalate) as per Directive (EU) 2015/863.



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TSE/BSE

EVA product is free of Transmissible Spongiform Encephalopathy and Bovine Spongiform Encephalopathy where no animal, animal products, veterinary vaccines or animal pathogens are added in the process nor in contact with packaging, storing nor transportation as per Commission Directive 2003/32/EC.

Phthalates

Phthalates are not used as additives or raw materials in the manufacture of EVA product as per Directive 2005/84/EC, Commission Decision 1999/815/EC.

Toys

EVA product meets the relevant requirements of Directive 2009/48/EC (replaced 88/378/EEC (Toy Safety))

VOC

EVA product complies with the Volatile Organic Content legislation, it is not considered to be volatile organic compounds (VOC), nor does it contain a VOC as per Directive 2004/42/EC.

ODC

EVA Product complies with regulation EC no. 2037/200 Ozone Depleting Substance (ODC) where none of the following materials are intentionally used in EVA manufacturing (chlorofluorocarbons, halons, carbon tetrachloride, 1,1,1-trichloroethane, hydrobromofluorocarbons).

WEEE

Directive 2002/96/EC on waste electrical and electronic equipment ("WEEE Directive") is regulating the recovery and disposal of waste electrical and electronics equipment. Therefore, the compliance with this directive has to be confirmed by the manufacturer of the final parts.

CONEG (Heavy Metals)

EVA product meets the requirement of Coalition of Northeastern Governors and Directive 94/62/EC. Where heavy metals (Cadmium, Lead, Mercury) are not intentionally added to the process.



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IKEA Specifications

EVA product meets the requirement of:

- IOS-MAT-0010
- IOS-MAT-0054
- IOS-MAT-0205
- IOS-MAT-0103

GADSL

EVA product is not in the Global Automotive Declarable Substance List.

Directive 2006/122/EC

EVA product complies with Directive 2006/122/EC where none of the following substances are present:

Perfluorinated compounds (PFC), Perfluorinated tenside (PFT), Perfluorooctanoic acid PFOA) & Perfluorooctane sulfonate (PFOS).

TNPP & TNPE

EVA product complies with Directive 2003/53/EC where it is free of Nonylphenol and its derivatives including Tris(nonylphenyl) Phosphite (TNPP) and Tris(nonylphenyl) ethoxylates (TNPE).

PAH

EVA product complies with Directive no. 208/2005 which Polycyclic Aromatic Hydrocarbons substances are added in the manufacturing.

Dodd-Frank Act

EVA product is free of Conflict Minerals (Tin, Tantalum, Tungsten, and Gold) which are also known as 3TG.

CMR Substances

EVA product complies with Directives no. 67/548/EEC and 76/769/EEC which (Carcinogens, Mutagens and toxic for reproduction) are not intentionally added into the process.

GMO

Genetic Modified Organisms and recombinant DNA technology are not present in EVA product process.

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POP

EVA product complies with Persistent Organic Pollutants Regulation (EU) 2019/1021. Where it is safe to the environment and human health.

Oeko Tex Standard 100

EVA product complies with Oeko Tex Standard 100. where it is safe for human use and free of more than 100 substances known to be harmful chemicals to human health.

European Resolution AP (92)

EVA product complies with European Resolution AP (92) regarding migration limits of known polymerization additives.

ZDHC MRSL

EVA product can be used by the group of apparel and footwear brands and retailers who are leading industries towards Zero Discharge of Hazardous Chemicals to minimize the impact on humans and environment. Therefore, substances in Manufacturing Restricted Substances List are not intentionally added to EVA product.

CLP Regulation

EVA product complies with the Regulation (EC) No. 1272/2008 for Classification, Labeling and Packaging. Which aligns with EU legislation to the United Nations Globally Harmonized System of Classification and Labelling of Chemicals (GHS).

Nitrosamine Free

Sipchem confirms that there is no possibility of Nitrosamine impurities (listed below) from the input material reaction chemistry (refer Annexure-II for starting material Route of synthesis) as well as from the manufacturing process of EVA.

Nitrosamine Impurities:

- N-nitrosodimethylamine (NDMA)
- N-nitrosodiethylamine (NDEA)
- N-nitroso-N-methyl-4-aminobutyric acid (NMBA)
- N-nitrosodiisopropylamine (NDIPA)
- N-nitroso-ethylisopropylamine (NEIPA)
- N-nitrosodibutylamine (NDBA)



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Global Chemical Inventories

EVA product is listed in the following Global Chemical Inventories:

- US TSCA Inventory
- EU EINECS/ELINCS/NLP
- Inventory of Existing Chemical Substances in China (IECSC)
- Japan Inventory of Existing and Notified Substances (ENCS)
- Japan ISHL Existing Substances List (ISHL)
- Korea Existing Chemicals List (KECL)
- Taiwan Chemical Substance Inventory (TCSI)
- Australian Inventory of Chemical Substances (AICS)
- Canada Domestic Substances List (DSL) and Non-Domestic Substances List (NDSL)
- New Zealand Inventory of Chemicals (NZIoC)
- Philippine Inventory of Chemicals and Chemical Substances (PICCS)
- Thailand Hazardous Substances List
- Malaysia Chemical Information Management System (CIMS)

Japanese Positive List Compliance

EVA complies with the Japanese Ministry of Health, Labor & Welfare (MHLW) Positive List system of Notification No. 370 (Substances for use in food contact materials)

cGMP

Sipchem declare that the manufacturing processes are compliant with the general principles of Current Good Manufacturing Practice. In particular, Sipchem has implemented procedures covering the following elements of GMP:

- Quality Assurance Systems and policies.
- Management Leadership and dedicated Resources.
- Hygiene policy and Pest control.
- Documentation, Labelling and acceptance.
- Raw material specifications and acceptance.
- Contamination prevention.
- Management of Change.
- Storage, Packaging, Warehousing and Transportation.
- Quality Control and specifications for finished products.
- Compliant handling, product recall, and incident management.
- Regular internal and supplier audits.



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Moreover, Sipchem is certified for the following international standards: Website Link

- 1) Quality Management System (ISO 9001:2015)
- 2) Occupational Health and Safety Management System (ISO 45001:2018)
- 3) Environmental Management System (ISO 14001)
- 4) Responsible Care (RC 14001)
- 5) Information Security Management System (ISO/IEC 27001:2013)
- 6) Energy Management System (ISO 50001:2018)
- 7) Asset Management System (ISO 55001:2014)

Swiss Ordinance (SR 817.023. 21)

EVA product complies with the regulation made by Swiss Federal Department of Home Affairs (FDHA) where it is safe for the use of all applications related to printing inks for non-food contact surfaces of food contact materials.

Absence of Substances and Chemicals

None of the following substances are used as additives or raw materials in the manufacture of EVA. However, since we do not systematically perform specific tests to verify the absence of these substances, we cannot guarantee that there is no trace amount of these substances, as impurity or otherwise, in EVA.

- Acrylamide.
- Alkylphenol Ethoxylates (APEOs).
- Allergens (as defined in Regulation (EU) No 1169/2011, as amended).
- Aromatic amines.
- Asbestos.
- Azodicarbonamide or semi-carbazide compounds.
- Benzophenone, hydroxybenzophenone and 4-methyl benzophenone.
- Biocides.
- Bisphenol-A (BPA), Bisphenol-F (BPF) and Bisphenol-S (BPS).
- Brominated flame retardants.
- Chlorofluorocarbons (CFC), hydrochlorofluorocarbons (HCFC), hydrofluorocarbons (HFC).
- Chlorinated Paraffins.
- Conflict minerals:
- Columbite-tantalite (Coltan, Niobium, Tantalum).
- Cassiterite (Tin).
- Wolframite (Tungsten).

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• رأس المال ۷٬۳۳۳٬۳۳۳٬۳۲۰ ریال سعودی



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- Gold.
- Decabromodiphenylether (decaBDE).
- 2-Ethylhexanoic Acid (2-EHA).
- Di(ethylhexyl) adipate (DEHA) and di(ethylhexyl) maleate (DEHM).
- Dimethyl Fumarate (DMF).
- Dioxins and furans.
- Endocrine Disruptors listed in the Japanese authority list "Strategic Programs on Environmental, Endocrine Disruptors '98 (SPEED '98) Table-3: Chemicals Suspected of Having Endocrine Disrupting Effects".
- Epoxy derivatives:
- BADGE [2,2-bis(4-hydroxyphenyl) propane bis(2,3-epoxypropyl) ether],
- BFDGE [bis(hydroxyphenyl)methane bis(2,3-epoxypropyl) ether],
- NOGE [novolac glycidyl ether] as defined in Directive 2002/16/EC amended by 2004/13/EC, repealed by the Regulation 1895/2005/EC.
- Epoxidised Soya Bean Oil (ESBO).
- Formaldehyde (formol).
- (Heavy) metals: Antimony, Arsenic, Beryllium, Cadmium, Cobalt, Copper, Hexavalent Chromium, Lead, Mercury, Nickel, Selenium, Titanium.
- Isopropylthioxanthone (ITX).
- Latexes and elastomers.
- Melamine and cyanuric acid.
- Mercapto mix.
- N-ethyl-o,p-toluolsulfonamide (NETSA) (CAS nb 1077-66-1).
- N-ethyl-p-toluenesulphonamide (NE-PTSA) (CAS nb 80-39-7).
- Nonylphenol and its derivatives including Tris(nonylphenyl) Phosphite (TNPP).
- Nanomaterials.
- Organo-tin compounds.
- Pentabromodiphenyl ether, octabromodiphenyl ether.
- Perfluorinated compounds (PFC), Perfluorinated tenside (PFT), Perfluorooctanoic acid (PFOA) & Perfluorooctane sulfonate (PFOS) listed in Directive 2006/122/EC.
- Poly (aromatic hydrocarbons) according to US Environmental Protection Agency Method 610 (EPA 610).
- Polybrominated biphenyls (PBBs), polybrominated diphenyl ethers (PBDEs), polybrominated terphenyls (PBTs).
- Polychlorinated biphenyls (PCBs), polychlorinated terphenyls (PCTs), polychlorinated naphthalenes (PCNs).



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- Polycyclic Aromatic Hydrocarbons (PAH).
- Recycled products as defined by Regulation (EC) 282/2008.
- Short-chain chlorinated paraffins.
- Silicone.
- Tert-butyl-4-hydroxyanisole (BHA) and 2,6-di-tert-butyl-p-cresol (BHT).
- Thiuram mix.
- Titanium Acetyl Acetone (TAA).
- Triclosan (2,4,4'-trichloro-2'-hydroxydiphenyl ether) (CAS no. 3380-34-5).
- Vinyl chloride monomer (VCM) and its polymers or copolymers (PVC, PVDC, ...).
- 2,4-Pentanedione
- Antthraquinone
- Benzene
- Chlorobenzenes
- DEAB (4,4'-Bis(diethylamino)benzophenone)
- Ethylbenzene
- Ethyleneimine (=aziridine)
- Glycol ethers of E-list and their acetates and beta-isomers of glycol ethers of P-list and their acetates
- Hydroquinone
- Linear Alkylbenzenes (defined as benzene with a linear alkyl C10-13 chain)
- Rhodamine-based pigments
- Sulfonamide type plasticisers (e.g. NETSA)
- Toluene
- 1 ethylpyrrolidin-2-one (NEP)
- Azo colorants
- 4-methylbenzophenone
- Chlorine compounds
- (MOSH & MOAH) / (POSH & PAO)
- Hexadecyltrimethoxysilane