MULTI–PLASTICS

Regulatory Compliance

Version: March 2023

Bicor™ ASB-X Acrylic / PVdC Coated OPP Film
End Use Compliance Statements

Heavy Metals and CONEG, California Toxics in Packaging Prevention Act Compliance Statement

Multi-Plastics, Inc. hereby certifies that **Bicor™ ASB-X Series Films** comply with the requirements of the toxics in packaging laws. Specifically:

- We certify that the regulated metals of lead, mercury, cadmium, and hexavalent chromium were not intentionally added to **Bicor™ ASB-X Series Films** during the manufacturing process.
- We further certify that the sum of the incidental concentration levels of lead, mercury, cadmium, hexavalent chromium present in **Bicor™ ASB-X Series Films** does not exceed 100 ppm by weight (CONEG model limit). These substances are also restricted or forbidden by provisions of EU Directive 2011/65/EU (RoHS Directive 2) and Directive 2015/863 (RoHS Directive 3) and EU Directive 94/62/EC on Packaging and Packaging Waste.

FDA Compliance Statement

Multi-Plastics, Inc. further guarantees that our **Bicor™ ASB-X Series Films** for food packaging applications is produced with olefin polymers which have been certified by our suppliers to be in compliance with the Federal Food and Drug regulations under 21 CFR 177.1520 or an effective food contact notification (FCN). Similarly, the coatings used to produce this product are in compliance with 21 CFR 175.320 or an effective food contact notification (FCN). As such, this product may be used with all food types (FDA's Food Types I-IX)[1], except infant formula and breast milk, under FDA's Conditions of Use C ("Hot filled or pasteurized above 150°F") through H ("Frozen or refrigerated storage: Ready-prepared foods intended to be reheated in container at time of use")[2].

If food type or contact temperature conditions differ from those cited above, please contact your Jindal Films representative for further information. This letter applies to all gauges of **Bicor™ ASB-X Series Films**.

[1] See 21 C.F.R. § 176.170(c), Table 1.
[2] See 21 C.F.R. § 176.170(c), Table 2

California Proposition 65, The Safe Drinking Water & Toxic Enforcement Act of 1986 Statement

Bicor™ ASB-X Series Films also pose no risk of cancer or reproductive hazards under the California Safe Drinking and Toxic Enforcement Act of 1986 (Proposition 65 - currently listed chemicals) directive and its amendments and therefore do not require a warning statement to consumers.

FDA Establishment and Maintenance of Records under the Public Health Security and Bioterrorism and Response Act of 2002 Statement

Jindal Films has been advised by our outside counsel that Jindal Films' obligations under the regulations are limited to making existing records available upon request to FDA. Jindal Films maintains such records as part of routine business activities.

Medical Device Statement

JFA does not recommend nor endorse the use of product(s) in any medical application and specifically disclaims any representation or warranty, express or implied, of suitability of fitness for use or otherwise with respect to use of product(s) in any medical application. Buyer represents and warrants that no product(s) purchased hereunder will be used in or resold to any commercial or developmental manner in connection with medical applications without JFA's prior express written acknowledgement. Further, Buyer agrees that it will make no representation, express or implied, to any person to the effect that JFA recommends or endorses the use of product(s) purchased hereunder in any medical application.

Animal Derivatives in Film Statement

Animal derivatives are not used in the manufacturing or the composition of **Bicor™ ASB-X Series Films**. Although animal derivatives are not used directly, some of the additives used by our suppliers (e.g. calcium stearate, zinc stearate, N,N-Bis(2-hydroxyethyl)alkyl(C8-C18)amine)) are based on fatty acids/esters that are derived from animal fats (tallow). These

additives are widely used throughout the food packaging industry. The quantity in our films will not exceed 0.2% and all are approved for food contact by the EC and US authorities.

Food Contact Status (Europe)

Bicor™ ASB-X Series Films have not been evaluated with regards to EU-Framework Regulation on materials and articles intended for Food Contact: Reg (EC) No 1935/2004 and in particular versus REG (EC) No 10/2011 on plastic materials and articles intended to come into contact with food.

REACH Compliance Statement

Manufacturers of **Bicor™ ASB-X Series Films** have provided written statements to us that their products which are ultimately exported to the EU by our customers are in full compliance with REACH. However, **Bicor™ ASB-X Series Films** products are *articles* in terms of REACH definitions and are therefore exempt from registration. These products do not contain substances which are released under normal or reasonably foreseeable conditions of use (REACH Article 7-1). EU-importers of Multi-Plastics' products are therefore relieved from any registration or notification obligations.

These statements also include all Substances of Very High Concern (SVHC) as is defined in Article 57 of REACH and Annex XVII list. However, please be advised that we do not specifically test **Bicor™ ASB-X Series Films** for each of those substances as they are not intentionally added to them and are not expected to be present at any levels above the threshold limits identified in REACH based on our detailed knowledge of all of the raw materials used in **Bicor™ ASB-X Series Films** products. This manufacturer's guarantee is valid for all SVHC's listed up to June 2024 including Annex 17.

Kosher

We use conventionally manufactured ingredients, including certain animal-based fatty acids, in the production of **Bicor™ ASB-X Series Films**. These ingredients are highly processed chemicals which comply fully with the laws and regulations administered by the Food and Drug Administration (FDA) and other regulatory agencies. Furthermore, **Bicor™ ASB-X Series Films** are manufactured in conformance to the high standards of Good Manufacturing Practices. We are therefore certain that they are in all respects safe and appropriate for their specific use from a regulatory perspective. Moreover, it is our current belief that the products we supply for your packaging needs may not adversely affect the Kosher status of your products. The availability of Kosher certification for food products packaged in Jindal Films films could depend on which certifying agency you consult.

Waste Packaging Directive – EU

Bicor™ ASB-X Series Films conform with the requirements as in the European Directive 94/62/EC on Packaging and Packaging Waste as amended by 2018/852 and that the environments were taken into account at the production of the films.

1.1.	Prevention of packaging waste by resource savings [EN 13427 : 2004]	Yes
1.2.	Heavy metals [CR 13695 - 2 : 2020]	Yes
1.3.	Hazardous substances [EN 13428 : 2004]	Yes
2.	Reuse [EN 13429 : 2004]	No
2.1.	Recycling of material [EN 13430 : 2004]	Yes
2.2.	Energy recovery [EN 13431 : 2004] - Calorific gain of films: minimum 22MJ/Kg	Yes
2.3.	Recovery by composting and biodegradation [EN 13432 : 2007]	No

End of Life Vehicle (ELV) EU Directive 2000/53/EC/IMDS

Bicor™ ASB-X Series Films, when used for labelling vehicles' parts, are not in the scope of:
Directive 2000/53/EC on end-of life vehicles (ELV), amended by EC Directive 2008/33/EC and Directive 2008/112/EC

As such and as converted into labels, films do not need to be IMDS registered. This product does not contain substances listed in GADSL (Global Automotive Declarable Substance List) above the reporting limits nor any declarable IMDS and VDA 232-101(List of Declarable Materials in Automotive Manufacturing) substance.

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RoHS (Restriction of the use of certain Hazardous Substances) – WEEE (Waste Electrical and Electronic Equipment

Bicor™ ASB-X Series Films are in compliance with the relevant heavy metals and flame retardant requirements of Directive 2011/65/EU including up to amendment EU 2017/2102 concerning the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS).

The concentrations of the following substances in **Bicor™ ASB-X Series Films** are compliant with the limitations indicated in the regulation:

Cadmium < 0.01%
Lead < 0.1%
Mercury < 0.1%
Hexavalent chromium < 0.1%
Flame retardants
- Polybrominated biphenyls (PBBs) <0.1%
- Polybrominated diphenyl ethers (PBDEs) <0.1%

Phthalates
- Bis(2-Ethylhexyl) phthalate (DEHP)<0.1%
- Benzyl butyl phthalate (BBP) <0.1%
- Dibutyl phthalate (DBP)<0.1%
- Diisobutyl phthalate (DIBP)<0.1%

Bicor™ ASB-X Series Films are also in compliance with Directive 2012/19/EU and its subsequent amendments up to 2018/849/EU, on waste electrical and electronic equipment (WEEE).

Directive 1999/45/EC concerning the Classification, Packaging and Labeling of Dangerous Preparations

The above directive does not apply to **Bicor™ ASB-X Series Films**.

Food Allergens

With reference to the US FDA Food Allergen Labelling and Consumer Protection Act (FALCPA) and the Reg. (EU) no 1169/2011, up to amendment (EU) no 2015/2283 - the following food allergens or products derived thereof are not intentionally introduced (**) for the manufacture of our films:

- Cereals containing gluten and products thereof
- Crustaceans and products thereof
- Eggs and products thereof
- Fish and products thereof
- Peanuts and products thereof
- Soybeans and products thereof
- Milk and products thereof (incl. Lactose)
- Nuts and products thereof
- Celery and products thereof
- Lupin and products thereof
- Mustard and products thereof
- Sesame seeds and products thereof
- Sulphur dioxide and sulphites at concentrations that may cause transfer from food packaging into food exceeding 10 mg/kg expressed as SO2
- Molluscs and products thereof

Consequently our product(s) may reasonably be expected not to contain allergenic substances. Our company has also taken all precautions in accordance with Good Manufacturing Practice to prevent unintentional contamination of our product(s) with food allergens.

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(**) "Intentionally introduced" shall mean: "deliberately utilized in the formulation of a material or component where its continued presence is desired in the final product to provide a specific characteristic, appearance or quality (EU Commission Decision 2002/525/EC)

ASTM F-963 and EN 71/3 Safety of Toys: Migration of Certain Elements

In accordance with the requirements of ASTM F-963 and EN 71/3 concerning the safety of materials for use in toy manufacture, **Bicor™ ASB-X Series Films** are certified to have metal and organotin contents within the required limits for the applicable toys materials category III (scrapped off material):

ALUMINUM (Al) 70 000 mg/kg	CHROMIUM III 460 mg/kg	MERCURY(Hg) 94 mg/kg
ANTIMONY (Sb) 560 mg/kg	CHROMIUM VI 0.2 mg/kg	NICKEL (Ni) 930 mg/kg
ARSENIC (As) 47 mg/kg	COBALT (Co) 130 mg/kg	SELENIUM (Se) 460 mg/kg
BARIUM (Ba) 56 000 mg/kg	COPPER (Cu) 7 700 mg/kg	STRONTIUM (Sr) 15 000 mg/kg
BORON (B) 15 000 mg/kg	LEAD (Pb) 160 mg/kg	ORGANIC TIN 12 mg/kg
CADMIUM (Cd) 17 mg/kg	MANGANESE (Mn) 15 000mg/kg	ZINC (Zn) 46 000 mg/kg

The individual levels of metals in our products tested at a certified laboratory are under the below limits:

ANTIMONY (Sb) < 0.5 mg/kg	CHROMIUM VI < 0.1 mg/kg	NICKEL (Ni) < 1.0 mg/kg
ARSENIC (As) < 2.5 mg/kg	COBALT (Co) < 0.1 mg/kg	SELENIUM (Se) < 0.1 mg/kg
BARIUM (Ba) < 1.0 mg/kg	COPPER (Cu) < 0.2 mg/kg	STRONTIUM (Sr) < 0.5 mg/kg
BORON (B) < 0.5 mg/kg	LEAD (Pb) < 0.5 mg/kg	TIN (Sn) < 1.0 mg/kg
CADMIUM (Cd) < 0.1 mg/kg	MANGANESE (Mn) < 0.5 mg/kg	ZINC (Zn) < 20 mg/kg
CHROMIUM III < 2.0 mg/kg	MERCURY (Hg) < 0.2 mg/kg	

We can guaranty also that, on metallized film,
ALUMINUM (Al) < 5 000 mg/kg

Chemical Control Information

Raw materials contained in **Bicor™ ASB-X Series Films** are on the following inventories or are exempt from the listing/notification requirements:

United States of America - Toxic Substance Control Act (TSCA)

Ozone Depleting Substances

No Class I or Class II Ozone-Depleting Substances are used in the manufacture of **Bicor™ ASB-X Series Films**.

Some of these substances may be used at some manufacturing sites, but only in direct support of manufacturing; e.g., as refrigerants and in fire suppression systems which the U. S. Environmental Protection Agency defines as non-contact incidental uses and exempt from the labeling requirements.

Bicor™ ASB-X Series Films are produced and composed in conformity with Regulation (EC) No 1005/2009 of the European Parliament and of the Council of 16 September 2009 on substances that deplete the ozone layer.

Other

The following materials are not intentionally used by Jindal Films in **Bicor™ ASB-X Series Films** and there is no reason to expect any of these materials to be present. In addition, we do not believe any of these materials are present in our manufacturing process and therefore do not test for their presence in this product. Further, while we do not believe that any of these materials are present in the individual components contained in this product, we do not have definitive information from our suppliers of these components, and we do not test them for the presence of any of these materials.

-4,4'-Diaminodiphenylmethane (MDA) - CAS 101-77-9
-Acetylacetone (2,4 Pentanedione) - CAS 123-54-6
-Acrylamide (2-propenamide) - CAS 79-06-1
-Adipates
-Alcanes, C10-13, chloro (Short-chained chlorinated paraffins) - CAS 85535-84-8
-AlkylPhenols
-Anthraquinone - CAS 84-65-1
-Antimony trioxide - CAS 1309-64-4
-Any additives to make the film OXO-degradable
-Aromatic Amines
-Aromatic Hydrocarbons (BTEX)

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-Asbestos - CAS 1332-21-4
-Azodicarbonamide (ADA)
-Benzene
-Benzophenone - CAS 119-61-9
-Benzophenone, hydroxybenzophenone and 4-methyl benzophenone
-Benzotrizoles
-Bisphenol A (BPA) - CAS 80-05-7
-Bisphenol B (BPB) – CAS 77-40-7
-Bisphenol C (BPC) - CAS 79-97-0
-Bisphenol F (BPF) - CAS 87139-40-0
-Bisphenol S (BPS) - CAS 80-09-1
-Brominated compounds
-ButhylHydroxyAnisole (BHA) - CAS 25013-16-5
-Carbon black – CAS 1333-86-4
-Cellulose - CAS 9004-34-6
-Chloro-Aromatics
-Chloroform - CAS 67-66-3
-ChloroFluoroCarbons (CFC)
-Conflict minerals (cassiterite /Tin ; columbite – Tantalite (coltan) / Tantalum) ; wolframite / Tungsten and gold) as referred to in title XV section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act
-Compounds from the benzopyrenes family
-Decabromodiphenylether - CAS 1163-19-5
-Dicyandiamid - CAS 461-58-5
-Di(ethylhexyl) adipate (DEHA) - CAS 103-23-1
-Di(ethylhexyl) maleate (DEHM) - CAS 142-16-5
-Dimethyl Fumarate (DMF) - CAS 624-49-7
-Dioxins and Furans
-Diisopropylnaphtalene (DIPN) - CAS 24157-81-1
-Endocrine disruptors, except phthalates. For more information, see our Phthalates letter.
-Epoxidized Soybean Oil (ESBO) - CAS 8013-07-8
-Ethylhexanoic Acid (2-EHA) - CAS 149-57
-Ethylhexyl acrylate – CAAS 103-11-7
-Flame retardants
-Fluorescent Brightening Agents (FBA)
-Fluorescent Whitening Agents (FWA)
-Formamide - CAS 75-12-7
-Free halogens
-Hexabromocyclododecane (HBCDD) - CAS 25637-99-4
-Hexachlorocyclohexane - CAS 319-84-6
-Hydroquinone – CAS 123-31-9
-Hydroxybenzophenone - CAS 1137-42-4
-Isopropyl Thioxanthone (ITX) - CAS 5495-84-1
-Methanol – CAS 67-56-1
-Methylbenzophenone - CAS 134-84-9
-Mica-group minerals
-Michler's ketone - CAS 90-94-8
-N-ethyl (ortho/para) toluenesulphonamide (NETSA) - CAS 8047-99-2
-N,N-dimethylformamide (DMF) - CAS 68-12-2
-Natural Rubber Latex
-Nitrofurazone - CAS 59-87-0
-Nitrosamines
-Orthophenylphenol (OPP) - CAS 90-43-7 and its salts
-Padimate ; 2-ethylhexyl 4-(dimethylamino) benzoate – CAS 21245-02-3
-Parabens
-Pentachlorophenol - CAS 87-86-5
-Per-and poly-fluoroalkyl substances (PFAS)
-Perchlorate - CAS 14797-73-0
-Perfluorinated Carboxylic Acids
-Perfluorinated tenside (PFT)
-Perfluoro-octanoic acid (PFOA) - CAS 0335-67-1
-Perfluoro-octanyl sulphonate(PFOS) - CAS 1763-23-1
-Persistent Organic Pollutants (POP) as listed in EC 850/2004 including amendment 2016/460
-Photoinitiators
-Plasticizers
-Polybrominated biphenyls (PBBs)
-Polybrominated diphenyl ethers (PBDEs)
-Polychlorinated biphenyl (PCB) - CAS 1336-36-3
-Polychlorinated naphthalenes (PCNs)
-Polychlorinated triphenyl (PCT) - CAS 61788-33-8
-Polycyclic Aromatic Compounds (PAC)
-Polycyclic Aromatic Hydrocarbons (PAH)
-Polyethylene glycol - (PEG) - CAS 25322-68-
-Polyfluoroalkyl phosphate esters
-Polyfluorinated telomers
-Polyoxymethylene (POM) - CAS 9002-81-7
-Rosin (Colophony) - CAS 8050-09-7
-Sulfur - CAS 7704-34-9
-Titanium Acetyl Acetone (TAA) - CAS 17927-72-9
-Triclosan - CAS 3380-34-5

Recyclability*

Technologies exist to recycle **Bicor™ ASB-X Series Films** post-consumer OPP film types: Mechanical, thermal and chemical (depolymerization). At present, these processes are not broadly available to the final consumer of these films, and therefore, post-consumer waste of these films cannot be defined as "recyclable". This is almost entirely due to problems related to collection and sorting of packaging waste rather than technical difficulty.

Industrial unprinted and unlaminated OPP film waste is highly recycled internally back into itself or other OPP film products, and externally through the domestic film reprocessing market. Jindal Films America has aligned itself with dozens of film waste reprocessors who buy its manufacturing film waste not reworked internally.

Special attention: PVdC coated film will give off hydrochloric acid when it is recovered in a process where the film is heated.

** Contact your Jindal Films sales representative for additional information concerning OPP and the environment.*

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Validity

This document is valid for two years after the date of issuance, or until a change in the relevant legislation or regulation, if this occurs sooner than two years.
Date of Issuance: March 21, 2023

The information provided is believed to be reliable but it is meant only as a guide and is not intended to show compliance with any specific end use. It is the users responsibility to assess all application requirements and then to assure full compliance with all laws, regulations, and standards. This compliance certification for Multi-Plastics, Inc. **Bicor™ ASB-X Series Films** shall remain in full force and effect for all shipments unless and until it is revoked in writing.

MULTI-PLASTICS, INC.

Philip Pappajohn
Director Research & Development

Disclaimer: this document is based on information given to us by our own suppliers by the date of this document and assessed with the best of our knowledge; it is valid only for products as described and delivered by us. It applies for use under normal or foreseeable conditions and does not represent a warranty as to merchantability or fitness for any particular application; it is the customer's responsibility to verify that the final packaging as printed, laminated, slit, treated, converted in any other way, or used as is on packaging equipment, after our delivery, is in compliance with any applicable legislation.