Product Responsibility List Follmann Chemie Group

The *Product Responsibility List (PRL)*, to which the Follmann Chemie Group is committed, is a negative list. It defines clear criteria for identifying substances that are considered undesirable in raw materials and traded goods. Substances included in the PRL possess properties that may pose risks to human health or the environment and are subject to current or anticipated regulatory measures.

The PRL consists of four levels. Each level reflects specific internal actions. Substances are assigned to one of the levels considering the following criteria: causing a specific classification of the raw material or traded good, belonging to a specific substance group or based on a substance specific decision.

- **Ban**: The use of substances is prohibited in general that cause one of the classifications or belong to one of substance groups given below.
- **Phase Out**: Specific substances, that fall in one of the groups of the level “ban”, but which are actively being phased out to eliminate their use in the future.
- **Restricted Use**: Specific substances, that fall in one of the groups of the level “ban”, but which use is permitted under defined conditions or for specific product groups.
- **Monitoring**: Substances that may face restrictions in the future by falling into a specific classification or belonging to a specific substance group.

We have defined that specific entries for individual substances have priority to the general entries of a substance group and/or a classification. The restricted use and the phase-out use of substances that would otherwise meet the criteria for a ban are always subject to a detailed risk assessment. This assessment considers both the protection of our employees and the environment, as well as the safety of the products manufactured. If less concerning alternatives are available, we aim for a phase-out.

Through a re-evaluation substances may fall under the self-imposed exclusion criteria during their ongoing use. For these cases, we have set a deadline of 6 months to either substitute the substances or complete the risk assessment and take all necessary actions to ensure their safe continued use under the new conditions.

Prohibited classifications and substance groups

We exclude raw materials and traded goods that meet the following criteria:

Classifications:

- Carcinogen or Mutagen Cat. 1A & 1B [H340, H350]
- Toxic to Reproduction Cat. 1A & 1B [H360]
- Acute Toxicity Cat. 1 & 2 [H300, H310, H330]
- Acute Toxicity Cat. 3 [H301, H311, H331]
- STOT RE 1 [H372]
- STOT SE 1 [H370]
- Lact Cat. 1 [H362]
- EUH29, EUH31, EUH32 [“Contact with water/acids liberates (very) toxic gas”]
- Endocrine Disruptor Human Health Cat.1 [EUH380]
- Endocrine Disruptor Environment Cat. 1 [EUH430]
- Persistent, Bioaccumulative and Toxic (PBT) [EUH440]
- very Persistent, very Bioaccumulative (vPvB) [EUH441]
- Persistent, Mobile and Toxic (PMT) [EUH450]
- very Persistent, very Mobile (vPvM) [EUH451]

Substance groups:

- Substances of Very High Concern (SVHC) > 0.1%
- Triaryl carbonium pigments (Fanal pigments)
- Conflict minerals (cobalt, gold, tantalum, tin, tungsten and their ores)
- Per- and polyfluoroalkyl substances (PFAS)

Substances with restricted use

Certain substances and raw materials that meet the criteria outlined above are subject to specific exemptions. Currently, no viable alternatives exist for these substances. Following a comprehensive risk assessment, their continued use has been approved under clearly defined restrictions and protective measures to reduce risks to both employees and the environment to an acceptable level. We actively prevent any additional uses and pursue proactive substitution or reduction strategies for existing applications.

In some markets and applications, these substances are considered critical. Therefore, we have established specific rules for our formulations—such as usage limitations or additional product safety measures—to minimize risks for downstream users. We monitor the quantities used on an annual basis and actively inform affected stakeholders about the use of these substances.

Strategic relevance of PRL

This PRL is a crucial component of our product responsibility strategy and is essential for maintaining a high standard of compliance with occupational health and safety, environmental responsibility, regulations, and voluntary commitments, both now and in the future.

Compliance-related issues and risks are communicated through the PRL, both internally and to our partners within our value chains. We encourage proactive communication regarding individual entries with our various stakeholders.