



Declaration of compliance for hazardous and/or restricted substances as of April 10, 2018

On behalf of TFL Ledertechnik GmbH (TFL) we give the following declaration, confirmation and/or information about the compliance of TFL chemical products with applicable rules and regulations concerning hazardous and/or restricted substances:

1. Regulatory compliance

All chemical products supplied by TFL

- Comply with the European Union (EU) regulations 1907/2006 (REACH) and 1272/2008 (CLP regulation). Substances identified as hazardous for health or the environment according to these regulations, are listed in section 3 of the safety data sheet (SDS). SDS are provided for all TFL chemical products including non-hazardous products.
- Comply with the REACH requirements for Substances of Very High Concern (SVHC) regarding REACH Annex XIV (authorisation) and the current Candidate List for SVHC (according to art. 59.1 of REACH). The SVHC Candidate List is updated approximately every 6 months and available at: <http://echa.europa.eu/candidate-list-table>.
- Comply with the restricted substances requirements of REACH Annex XVII. This annex contains the EU restrictions for the manufacture, marketing and use of chemical substances and is available at: <https://echa.europa.eu/substances-restricted-under-reach>
- Comply with the EU Biocide Regulation 528/2012 concerning the making available on the market and use of biocidal products. This regulation is available at: <https://echa.europa.eu/regulations/biocidal-products-regulation/understanding-bpr>

2. Compliance with the requirements of the Manufacturing Restricted Substances List (MRSL) of ZDHC (Version 1.1, chapter 2 (leather), December 2015)

All chemical products supplied by TFL comply with the ZDHC MRSL List. Exemptions are listed in the table below and are due to currently unavoidable impurities of some raw materials.

Chemical substances restricted by the MRSL are not intentional components of TFL chemicals. The MRSL list and further information of ZDHC is available at: <http://www.roadmaptozero.com/>

The statement of compliance with the ZDHC MRSL is made by self-declaration based on the internal TFL testing and auditing regime.

Declaration of compliance for hazardous and/or restricted substances

Disclaimer:

Page 1 of 15

This statement is made in good faith according to our present state of knowledge of our and our suppliers' products, their ingredients and processes, as well as the applicable regulations. There may be changes and influences beyond our control. **Our Declaration of Compliance is not and may not be interpreted as express or implied guarantee for the compliance of each and any product.** It is intended to serve as a guidance document. It does not relieve the users of our products from their responsibility to control and test the products. This Declaration of Compliance shall be valid until superseded by a later version.



Declaration of compliance for hazardous and/or restricted substances as of April 10, 2018

TFL chemicals possibly not in compliance with the ZDHC MRSL

| Product name | Requirement | Parameter |
|--------------------|-------------|---|
| CORIPOL BZE-N | MRSL | NPEO possibly > 100 - < 2500 ppm |
| RODA FEEL MICROSIL | MRSL | 2-ethoxyethanol possibly 900 - < 1000ppm |
| RODA WAX 4097 | MRSL | 2-ethoxyethanol possibly 50 ppm - < 100 ppm |

Annex 1 of this declaration contains additional information regarding selected restricted substances. Leather chemicals supplied by TFL in compliance with the ZDHC MRSL are listed in **Annex 2**.

Please note that TFL does not analyse all raw materials for possible contaminations on a regular basis and that TFL leather chemicals are of technical grade.

With regard to other liabilities please see the disclaimer below.

All compliance statements made above refer to the state of the regulations/requirements as of the date of issue of this declaration which shall be valid until superseded by a later version.

On behalf of TFL Ledertechnik GmbH

| | |
|---|--|
| Dr. Jürgen Christner Head of Research, Quality and Product Compliance TFL Ledertechnik AG 4132 Muttenz / Switzerland E-mail: jurgen.christner@tfl.com | Dr. Margret Jobelius-Korte Head of Product Safety and Registration TFL Ledertechnik AG 4132 Muttenz / Switzerland E-mail: margret.jobelius-korte@tfl.com |
|---|--|

Declaration of compliance for hazardous and/or restricted substances

Disclaimer:

This statement is made in good faith according to our present state of knowledge of our and our suppliers' products, their ingredients and processes, as well as the applicable regulations. There may be changes and influences beyond our control. **Our Declaration of Compliance is not and may not be interpreted as express or implied guarantee for the compliance of each and any product.** It is intended to serve as a guidance document. It does not relieve the users of our products from their responsibility to control and test the products. This Declaration of Compliance shall be valid until superseded by a later version.



Declaration of compliance for hazardous and/or restricted substances as of April 10, 2018

ANNEX 1 - BACKGROUND INFORMATION ON RESTRICTED SUBSTANCES

1. Substances restricted by the ZDHC MRSL

Alkylphenol ethoxylates (APEO)

The APEO type surfactants have been widely used as non-ionic detergents and emulsifiers in many industries. A natural-based fatty substance like wool grease can still contain residues of NPEO from the wool washing. Wool grease is a component of CORIPOL BZE-N. Normally the NPEO content of CORIPOL BZE-N is below the MRSL limits, but in exceptional cases this limit could be exceeded.

Dyes that can release restricted primary aromatic amines in dyes

The ZDHC MRSL and REACH Annex XVII both restrict dyes which may release certain primary aromatic amines upon reductive cleavage of the dye. The relevant analytical method is EN ISO 17234; this method also includes information on false positive test results possible for a few dyes.

TFL does not intentionally use these restricted aromatic amines in the manufacture of TFL dyes.

Heavy metals

Relevant restrictions:

The ZDHC MRSL bans the use of certain heavy metals (As, Cd, Hg, Pb and Cr(VI)). Additionally, it requires that other metals except chromium comply with the ETAD limits. (**E**cological and **T**oxicological **A**ssociation of **D**yes and **O**rganic **P**igments **M**anufacturers; see <http://www.etad.com/>.) The ETAD limits apply to metal impurities, not to metals as an inherent component in the structure or composition of a product.

Furthermore, the heavy metals banned by the ZDHC are also restricted in REACH Annex XVII. It is important to note that the EU Toys Safety directive 2009/48/EC limits the extractable metal content in toys without differentiating between inherent components and impurities. See Tables 1. – 4. for details on TFL chemicals.

Testing methods:

In the context of the EU Toys Safety directive 2009/48/EC, extractable metals are determined using the EN 71-3 Standard. This European Standard often appears as a method in leather specifications. It should be noted that the extraction is made at pH 1.0 – 1.5, to simulate gastric juices. Leather and coated materials are to comply with the Category III limits in the EN 71-3 Standard.

For simulating skin contact, a more realistic method for determining extractable metals in leather is the Standard, EN ISO 17072-1, which performs the extraction at pH 5.5 (artificial perspiration).

For determining the total metal content of leather the Standard, EN ISO 17072-2, is used.

Declaration of compliance for hazardous and/or restricted substances

Disclaimer:

Page 3 of 15

This statement is made in good faith according to our present state of knowledge of our and our suppliers' products, their ingredients and processes, as well as the applicable regulations. There may be changes and influences beyond our control. **Our Declaration of Compliance is not and may not be interpreted as express or implied guarantee for the compliance of each and any product.** It is intended to serve as a guidance document. It does not relieve the users of our products from their responsibility to control and test the products. This Declaration of Compliance shall be valid until superseded by a later version.



Declaration of compliance for hazardous and/or restricted substances as of April 10, 2018

TFL products

TFL does not intentionally use the heavy metals banned by the ZDHC MRSL in the manufacture of TFL chemicals. Some TFL dyes and pigments contain heavy metals such as chromium-III, copper, cobalt or iron as metal complex dyestuff or as part of a pigment preparation. In these cases, the heavy metal is an inherent component of the product. Please refer to tables 1. - 4. in the appendix to this annex for more details. Information on the type and amount of heavy metal are available in Section 3 (or section 12 of the older versions) of the SDS.

Chromium (VI): Salts of chromium (III) are used in the tanning of leather. The TFL chemical products and colorants with chromium are based on chromium (III) only, chromium (VI) is not used. However, traces of chromium (VI) could form in tannery processes if oxidative conditions occur.

Naphthalene

There is no EU restriction regarding naphthalene in chemicals or leather. However, the ZDHC MRSL specification for polycyclic aromatic hydrocarbons (PAH) includes naphthalene, which is listed as a PAH in the USA. Naphthalene is a basic chemical for the manufacture of some syntans and dispersing agents. The TFL manufacturing processes are optimised to minimise any residual naphthalene; if present, residues will be at trace levels and in compliance with the MRSL limit requirements for leather chemicals.

Per- and poly-fluorinated chemicals (PFC)

Fluorinated chemicals can be applied to leather to give water, oil and soil resistance. TFL does not intentionally use C8-chain type perfluorinated substances, e.g. PFOS & PFOA in the manufacture of TFL chemicals.

Phthalates

TFL does not add phthalates in the manufacture of TFL chemicals. However, these substances are used as plasticizers in a large variety of articles such as plastic materials, rubbers or glues. As phthalates are not chemically bonded to the matrix, trace amounts may be released in contact with solvents.

Some TFL RODA Lac product can contain considerable quantities of solvents. If these products come into contact with phthalate containing materials, traces of phthalates may be dissolved from the material and lead to contamination of the product at a level usually well below the limits of the ZDHC MRSL.

Short chain chlorinated paraffins (SCCP)

Chlorinated paraffins can be used as an auxiliary fatliquor to give leather special characteristics. The C10 – C13 SCCP are restricted and not intentionally used by TFL. The approved test method for leather is ISO

Declaration of compliance for hazardous and/or restricted substances

Disclaimer:

Page 4 of 15

This statement is made in good faith according to our present state of knowledge of our and our suppliers' products, their ingredients and processes, as well as the applicable regulations. There may be changes and influences beyond our control. **Our Declaration of Compliance is not and may not be interpreted as express or implied guarantee for the compliance of each and any product.** It is intended to serve as a guidance document. It does not relieve the users of our products from their responsibility to control and test the products. This Declaration of Compliance shall be valid until superseded by a later version.



Declaration of compliance for hazardous and/or restricted substances as of April 10, 2018

18219. Since the chlorinated paraffins are mixtures of many chemical structures and degrees of chlorination, they are difficult to accurately analyse.

2. **Additional substances of interest**

In addition to the ZDHC MRSL, various lists of restricted substances (RSL) for leather have been issued which may contain other substances and/or specifications and which may be based on legal provisions in certain countries or more likely on single customer or general industry requirements. In general, leather made according to TFL recommendations will comply with such additional restricted substance specifications as well. However, in case of requirements not covered by the compliance declaration above, TFL recommends disclosure of the details to TFL for specific check.

Formaldehyde

If a chemical product contains 0.1% or more of formaldehyde, this will be indicated in section 3 of the SDS. Formaldehyde is a basic raw material for manufacturing some leather chemicals, e.g. syntans, resins and auxiliary chemicals. Manufacturing processes are continually being optimised to eliminate or minimise residual levels of formaldehyde. This is an ongoing programme.

Formaldehyde residues in leather are caused not only by the chemicals used but also depend on the tannery application processes.

TFL products listed in the appendix section on free-formaldehyde (see table 5. - 7.) contain free-formaldehyde but can be used along with other TFL products to manufacture leather that complies with the normal formaldehyde specifications of brands and eco-labels.

Analytical methods:

Chemicals are analysed for free-formaldehyde according to EN ISO 27587-1.

Leather is analysed for free and hydrolysable formaldehyde according to EN ISO 17226-1.

Note: The EN ISO 17226-1 methods for leather are not suitable for analysing chemical samples as the strong acid added to the test sample will break down the formaldehyde condensate and release formaldehyde.

For emission of formaldehyde from leather into a closed space, e.g. in automotive interiors, the analysis is made according to EN ISO 17226-3.

Medium chain chlorinated paraffins (MCCP)

As mentioned above under "Short chain chlorinated paraffins (SCCP)", this type of substances can be used as auxiliary fatliquor. The C14 – C17 MCCP are neither restricted by regulations nor by the ZDHC MRSL. Many RSL however restrict the use of MCCP. TFL does not intentionally use MCCP in the manufacture of TFL chemicals.

Declaration of compliance for hazardous and/or restricted substances

Disclaimer:

Page 5 of 15

This statement is made in good faith according to our present state of knowledge of our and our suppliers' products, their ingredients and processes, as well as the applicable regulations. There may be changes and influences beyond our control. **Our Declaration of Compliance is not and may not be interpreted as express or implied guarantee for the compliance of each and any product.** It is intended to serve as a guidance document. It does not relieve the users of our products from their responsibility to control and test the products. This Declaration of Compliance shall be valid until superseded by a later version.



Declaration of compliance for hazardous and/or restricted substances as of April 10, 2018

Some C17 chain-length paraffin (MCCP) can be present as impurity in CORIPOL ICL which is based on long chain chlorinated paraffin with a chain length of C18 and higher (LCCP). Using the TFL recommended application amounts of less than 1%, levels of MCCP in treated leather are expected to be within the limit of 1000 ppm typical of leather specifications.

In addition, a few TFL products contain saponified sulfochlorinated paraffins of chain-length \geq C18. These products may contain impurities of C17 chain-length chlorinated paraffins (MCCP). Using the recommended application amounts of up to 15%, levels of MCCP in treated leather are expected to be below the 1000 ppm limit typical of leather specifications for brands. The concerned products are CORIPOL DX 902, CORIPOL DX 1202 and CORIPOL UFB/W.

Preserving agents, biocides and pesticides

Solid products (e.g. powders or granulates) usually don't contain any preserving agents. A number of liquid water based TFL product require the addition of preserving agents to protect them from deterioration by microbial attack. These preserving agents are necessary to guarantee the quality of the product during transport and storage. TFL is using preserving agents that are accepted in the leather industry and aims to apply the minimum amounts required to ensure product quality.

The following TFL trademarks can contain small amounts of preserving agents:

- some ERHAVIT products contain small amounts (<0.1%) of o-phenylphenol (OPP), its salt, or p-chloro-m-cresol (CMK);
- products of the CORIPOL, DRYWALK, MAGNOPAL and RODA brands may contain small amounts of isothiazolinones (BIT, CMIT/MIT, MIT, OIT), bronopol or CMK.

Preserving agents in TFL products are listed on the label and in section 2 or 3 of the SDS if quantities are relevant for the hazard communication rules of the EU CLP regulation.

Please note: TFL is not using DMF (dimethylfumarate) in its products. TFL is also not using pesticides listed in the Stockholm convention (such as Aldrin, DDT, Dieldrin, Endrin, Endosulfane, Heptachlor, Hexachlorobenzene, Lindane, Mirex, Toxaphen). Also, 2,4,5-T, HCH, Heptachlor, Malathion, Parathion, Permethrin, Tolyfluanide are not used by TFL.

Declaration of compliance for hazardous and/or restricted substances

Disclaimer:

Page 6 of 15

This statement is made in good faith according to our present state of knowledge of our and our suppliers' products, their ingredients and processes, as well as the applicable regulations. There may be changes and influences beyond our control. **Our Declaration of Compliance is not and may not be interpreted as express or implied guarantee for the compliance of each and any product.** It is intended to serve as a guidance document. It does not relieve the users of our products from their responsibility to control and test the products. This Declaration of Compliance shall be valid until superseded by a later version.



Declaration of compliance for hazardous and/or restricted substances as of April 10, 2018

ANNEX 2 - TFL CHEMICALS IN COMPLIANCE WITH THE ZDHC MRSI

| | | |
|-----------------|-------------------------|------------------------|
| ARACIT DA | RODA COOL WHITE | RODA SEAL 5088 |
| ARACIT KL NEW | RODA COOL YELLOW | RODA SILVER TOP 578 SF |
| BORRON A | RODA COR HTP BLACK | RODA SPECIAL BLACK R |
| BORRON DL | RODA COR HTP BLUE | RODA TEC AI |
| BORRON DLS | RODA COR HTP DARK BROWN | RODA TEC AW |
| BORRON DN | RODA COR HTP FUCHSIA | RODA VISC 5112 |
| BORRON DNC | RODA COR HTP GREEN | RODA VISC 5722 |
| BORRON LB | RODA COR HTP LEMON | RODA WAX 1423 |
| BORRON NF | RODA COR HTP OCHRE | RODA WAX 2000 |
| BORRON SAF | RODA COR HTP ORANGE | RODA WAX 2009/N |
| BORRON SCA | RODA COR HTP RED | RODA WAX 2011 |
| BORRON SE | RODA COR HTP RED BROWN | RODA WAX 2014 |
| BORRON ST | RODA COR HTP WHITE | RODA WAX 33 CONC |
| BORRON WP | RODA COR HTP YELLOW | RODA WAX 4001 |
| CORIPOL A | RODA CRYL 108/N | RODA WAX 4039 |
| CORIPOL ALF | RODA CRYL 114 | RODA WAX 4053 |
| CORIPOL AT | RODA CRYL 137 | RODA WAX 4070 |
| CORIPOL AV | RODA CRYL 165 | RODA WAX 4077/N |
| CORIPOL DX-1202 | RODA CRYL 5037 | RODA WAX 4092 |
| CORIPOL DX-902 | RODA CRYL 5059 | RODA WAX 4121 |
| CORIPOL EF | RODA CRYL 5110 | RODA WAX 5044 |
| CORIPOL ESA-N | RODA CRYL 5416 | RODA WAX 5634/N |
| CORIPOL ESU | RODA CRYL 5748 | RODA WAX 944 |
| CORIPOL GF | RODA CRYL 577/N2 | RODA WAX AS/2 |
| CORIPOL GMT | RODA CRYL 744 | RODA WAX DW 4054 |
| CORIPOL GU | RODA CRYL I 101 | RODA WAX DW 4081 |
| CORIPOL ICL | RODA CRYL IL | RODA WAX K 619 |
| CORIPOL K | RODA CRYL MS | RODA WAX KCF 604/N |
| CORIPOL LE | RODA CRYL NP 86 | RODA WAX KCF 616 |
| CORIPOL LEO | RODA CRYL NP 87 | RODA WAX KCF 638 |
| CORIPOL MK | RODA CRYL R 504 | RODA WAX KCF 684 |
| CORIPOL PL | RODA DEFOAM 5668 | RODA WAX KCF 699 |
| CORIPOL SB | RODA DYE BLACK NF | RODA WAX KCF 8801/A |
| CORIPOL SFC | RODA DYE BLACK W NF | RODA WAX KCF 90212/N |

Declaration of compliance for hazardous and/or restricted substances

Disclaimer:

This statement is made in good faith according to our present state of knowledge of our and our suppliers' products, their ingredients and processes, as well as the applicable regulations. There may be changes and influences beyond our control. **Our Declaration of Compliance is not and may not be interpreted as express or implied guarantee for the compliance of each and any product.** It is intended to serve as a guidance document. It does not relieve the users of our products from their responsibility to control and test the products. This Declaration of Compliance shall be valid until superseded by a later version.



Declaration of compliance for hazardous and/or restricted substances as of April 10, 2018

| | | |
|-----------------|------------------------|----------------------------|
| CORIPOL SG | RODA DYE BLUE NF | RODA WAX KCF 92400 |
| CORIPOL SLG | RODA DYE DARK BROWN NF | RODA WAX MONO |
| CORIPOL SV | RODA DYE FUCHSIA NF | RODA WAX P 50 |
| CORIPOL TR | RODA DYE HAVANA NF | RODA WAX PR 33 |
| CORIPOL UFB/W | RODA DYE LEMON NF | RODA WAX PUR |
| CROMENO FBQ | RODA DYE LIGHT BLUE NF | RODA WAX SCH/N |
| CROMENO FNH | RODA DYE NAVY NF | RODA WAX SYNERGY/N |
| CROMENO MFN/1 | RODA DYE ORANGE NF | RODA WAX T1 |
| DERMASCAL ASB-F | RODA DYE RED NF | RODA WAX W 706 |
| DERMASCAL CD | RODA DYE YELLOW NF | RODA WAX W 746 |
| DERMASCAL F | RODA FEEL 1061 | SELLA COOL BLACK |
| DRYWALK AF | RODA FEEL CLD-N | SELLA COOL BROWN |
| DRYWALK FAT | RODA FEEL F 721 | SELLA COOL BURGUNDY |
| DRYWALK IN | RODA FEEL K 980 | SELLA COOL CITRON |
| DRYWALK POL NEW | RODA FEEL KTA 944 | SELLA COOL GREY |
| DRYWALK WAM | RODA FEEL KTA 950 | SELLA COOL IVORY |
| DRYWALK WAS-1 | RODA FEEL N4 | SELLA COOL OCEAN |
| ERHA GM 3034-BR | RODA FEEL S 2075 | SELLA COOL ORANGE |
| ERHA GM 3995 | RODA FEEL S 2081 | SELLA COOL SCARLET |
| ERHAVIT DMC | RODA FEEL S 5650 | SELLA DERM BLACK M2 |
| ERHAVIT EF | RODA FEEL S 5796 | SELLA DERM BLACK R M2 |
| ERHAVIT FA | RODA FEEL S 768/N | SELLA DERM BLUE M2 |
| ERHAVIT HB | RODA FEEL S 930 | SELLA DERM BORDEAUX M2 |
| ERHAVIT HS2 | RODA FEEL SR 5086 | SELLA DERM BROWN M2 |
| ERHAVIT LSU | RODA FILL BL | SELLA DERM CITRON M2 |
| ERHAVIT MB | RODA FIX 1051 | SELLA DERM FUCHSIA M2 |
| ERHAVIT SP | RODA FIX 1052 | SELLA DERM LIGHT BLUE M2 |
| INVADERM AL | RODA FIX 5010 GLOSS | SELLA DERM NAVY M2 |
| INVADERM DB | RODA FIX 5020 | SELLA DERM ORANGE M2 |
| INVADERM LU | RODA FIX 5040 DULL | SELLA DERM PINK M2 |
| INVADERM P | RODA FIX 5090 | SELLA DERM RED BROWN M2 |
| INVADERM RA | RODA FIX 5091 DULL | SELLA DERM RED M2 |
| INVADERM SN | RODA FIX 5100/N | SELLA DERM YELLOW BROWN M2 |
| MAGNOPAL DP | RODA FIX 5180/N DULL | SELLA DERM YELLOW M2 |
| MAGNOPAL FIS | RODA FIX 5188/N GLOSS | SELLA FAST BEIGE A |
| MAGNOPAL FTP | RODA FIX 5750 DULL | SELLA FAST BEIGE AR |

Declaration of compliance for hazardous and/or restricted substances

Page 8 of 15

Disclaimer:

This statement is made in good faith according to our present state of knowledge of our and our suppliers' products, their ingredients and processes, as well as the applicable regulations. There may be changes and influences beyond our control. **Our Declaration of Compliance is not and may not be interpreted as express or implied guarantee for the compliance of each and any product.** It is intended to serve as a guidance document. It does not relieve the users of our products from their responsibility to control and test the products. This Declaration of Compliance shall be valid until superseded by a later version.



Declaration of compliance for hazardous and/or restricted substances as of April 10, 2018

| | | |
|-----------------|----------------------|---------------------------|
| MAGNOPAL HS | RODA FIX 5790 DULL | SELLA FAST BEIGE E |
| MAGNOPAL IPF | RODA FIX 5792/N | SELLA FAST BEIGE HF-GL |
| MAGNOPAL IPR | RODA FIX 6271-B | SELLA FAST BLACK A |
| MAGNOPAL PGN | RODA FIX EF 5802 | SELLA FAST BLACK AID |
| MAGNOPAL PS-N | RODA FIX EP 8806 | SELLA FAST BLACK B CONC |
| MAGNOPAL RHN | RODA FIX GLOSS 100 | SELLA FAST BLACK FN CONC |
| MAGNOPAL SFT-F | RODA FIX SR 04 | SELLA FAST BLACK FS |
| MAGNOPAL SOF | RODA FIX SR 05 GLOSS | SELLA FAST BLACK FT |
| MAGNOPAL TGR | RODA FIX WF 2185 | SELLA FAST BLACK HBR CONC |
| OROPON BRS GRAN | RODA FLUO BLUE 16 | SELLA FAST BLACK HM |
| OROPON DVP | RODA FLUO CITRON 16 | SELLA FAST BLACK HM CONC |
| OROPON G | RODA FLUO FUCHSIA 16 | SELLA FAST BLACK HMR CONC |
| OROPON K | RODA FLUO GREEN 16 | SELLA FAST BLACK HS CONC |
| OROPON MS gran | RODA FLUO ORANGE 16 | SELLA FAST BLACK HS-02 |
| OROPON MT gran | RODA FLUO RED 16 | SELLA FAST BLACK IG CONC |
| OROPON ON2 | RODA GROUND 4014 | SELLA FAST BLACK NS-01 |
| OROPON OO | RODA GROUND 4078 | SELLA FAST BLACK NS-02 |
| OROPON OO GRAN | RODA GROUND 5300 | SELLA FAST BLACK P-S |
| OROPON OR | RODA GROUND 561 | SELLA FAST BLACK WB |
| OROPON OR GRAN | RODA GROUND 678 | SELLA FAST BLUE 4GL |
| OROPON OXX | RODA GROUND 711/L | SELLA FAST BLUE A |
| OROPON OXX GRAN | RODA GROUND 772/HD | SELLA FAST BLUE BBN |
| OROPON W GRAN | RODA GROUND K 4038/F | SELLA FAST BLUE LN |
| OROPON WB | RODA GROUND KCF 614 | SELLA FAST BORDEAUX A |
| PELLVIT APC | RODA GROUND KCF 647 | SELLA FAST BORDEAUX RVN |
| PELLVIT C | RODA GROUND NIC | SELLA FAST BROWN A |
| PELLVIT CSW | RODA GROUND RECO 5 | SELLA FAST BROWN ADF |
| PELLVIT DPH NEW | RODA GROUND UP-XS | SELLA FAST BROWN C-G |
| PELLVIT IS-A | RODA KP BLACK SUPER | SELLA FAST BROWN CR |
| PELLVIT KAB-P | RODA KP BLUE | SELLA FAST BROWN DB |
| PELLVIT LSG | RODA KP BROWN | SELLA FAST BROWN DGR |
| PELLVIT LSS | RODA KP DARK BROWN | SELLA FAST BROWN DR |
| PELLVIT MN | RODA KP OCHRE | SELLA FAST BROWN DS |
| PM 4700 | RODA KP ORANGE | SELLA FAST BROWN DZ 150% |
| PM 4701 | RODA KP RED | SELLA FAST BROWN EGR |
| PM 4800 | RODA KP RUBY N | SELLA FAST BROWN GD |

Declaration of compliance for hazardous and/or restricted substances

Disclaimer:

This statement is made in good faith according to our present state of knowledge of our and our suppliers' products, their ingredients and processes, as well as the applicable regulations. There may be changes and influences beyond our control. **Our Declaration of Compliance is not and may not be interpreted as express or implied guarantee for the compliance of each and any product.** It is intended to serve as a guidance document. It does not relieve the users of our products from their responsibility to control and test the products. This Declaration of Compliance shall be valid until superseded by a later version.



Declaration of compliance for hazardous and/or restricted substances as of April 10, 2018

| | | |
|-------------------------|---------------------------|--------------------------|
| RODA BASE 4068 | RODA KP WHITE | SELLA FAST BROWN H |
| RODA BASE 4095/N | RODA KP YELLOW | SELLA FAST BROWN HC |
| RODA BASE 5094 ML | RODA LAC 1028 | SELLA FAST BROWN HE-M |
| RODA BASE 5096 NM | RODA LAC 103 DULL | SELLA FAST BROWN HF-G |
| RODA BASE 5514 | RODA LAC 3 | SELLA FAST BROWN HF-R |
| RODA BASE 5615 | RODA LAC 57 | SELLA FAST BROWN HG |
| RODA BASE 5698 | RODA LAC 62 | SELLA FAST BROWN HH 150% |
| RODA BASE 5749 | RODA LAC 93 | SELLA FAST BROWN MFR |
| RODA BASE 5786 | RODA LAC CAB DULL | SELLA FAST BROWN OM |
| RODA BASE AF-B | RODA LAC CAB GLOSS | SELLA FAST BROWN OV |
| RODA BASE CC | RODA LAC ON 3050-N | SELLA FAST DARK BROWN A |
| RODA BASE DW 4088/N | RODA LAC S 210 | SELLA FAST GREEN 2GB |
| RODA BASE K 5025/F | RODA LAC S 214 | SELLA FAST GREEN A |
| RODA BASE NT | RODA LAC S GLOSS G | SELLA FAST GREEN GDN |
| RODA BASE RECO 3 | RODA LAC W 4076/N DULL | SELLA FAST GREEN GM |
| RODA BASE RECO 8 | RODA LAC WG/4 | SELLA FAST GREY A |
| RODA BASE SB | RODA LAC WG/4 BLACK | SELLA FAST GREY C-LL |
| RODA BASE SPL | RODA LAC WLL/1 | SELLA FAST GREY NL |
| RODA BASE TAM | RODA LAC WR | SELLA FAST GREY VWL |
| RODA BASE UP | RODA LINK 3315/F | SELLA FAST HAVANA A |
| RODA BASE WH 0303 | RODA LINK 4009 | SELLA FAST HAVANA E |
| RODA BIND 1101 | RODA LINK 5504/N | SELLA FAST NAVY A |
| RODA BIND 1430 | RODA LINK 5777 | SELLA FAST NAVY G |
| RODA BIND 1505 | RODA LINK A 60 | SELLA FAST OLIVE 2G |
| RODA BIND 232 | RODA LINK AA 4010 | SELLA FAST OLIVE SG |
| RODA BIND 682 | RODA LINK C 70 | SELLA FAST ORANGE 2GC |
| RODA BIND 896 | RODA LINK FIX 7 | SELLA FAST ORANGE A |
| RODA BIND 902 PF | RODA LINK IL 5095 | SELLA FAST ORANGE RO |
| RODA BIND CS BLACK 5128 | RODA LITE BLACK 07 | SELLA FAST RED 2B |
| RODA BIND K 4080 | RODA LITE BLACK SH | SELLA FAST RED A |
| RODA BIND TLC 300 | RODA LITE BLUE 07 | SELLA FAST RED BROWN A |
| RODA BIND TLC 327 | RODA LITE FUCHSIA 07 | SELLA FAST RED E |
| RODA BIND TLC 330 | RODA LITE LEMON 07 | SELLA FAST RED F |
| RODA BIND TLC 385 | RODA LITE OCHRE 07 | SELLA FAST RED RTN |
| RODA BIND TU 688/B | RODA LITE ORANGE 07 | SELLA FAST SCARLET L |
| RODA BLACK APPRETTO 356 | RODA LITE ORANGE BROWN 07 | SELLA FAST TURQUOISE 2BL |

Declaration of compliance for hazardous and/or restricted substances

Disclaimer:

This statement is made in good faith according to our present state of knowledge of our and our suppliers' products, their ingredients and processes, as well as the applicable regulations. There may be changes and influences beyond our control. **Our Declaration of Compliance is not and may not be interpreted as express or implied guarantee for the compliance of each and any product.** It is intended to serve as a guidance document. It does not relieve the users of our products from their responsibility to control and test the products. This Declaration of Compliance shall be valid until superseded by a later version.



Declaration of compliance for hazardous and/or restricted substances as of April 10, 2018

| | | |
|-------------------------|---------------------------------|------------------------|
| RODA CAR B 33 | RODA LITE RED 07 | SELLA FAST VIOLET RL |
| RODA CAR B 34/N | RODA LITE RED BROWN 07 | SELLA FAST YELLOW 4GL |
| RODA CAR B 35 | RODA LITE RED VIOLET 07 | SELLA FAST YELLOW A |
| RODA CAR B 98 | RODA LITE VIOLET BROWN 07 | SELLA FAST YELLOW R |
| RODA CAR BLACK P | RODA LITE WHITE 07 | SELLA FIN BLACK PN |
| RODA CAR BLACK SH P | RODA LITE WHITE N | SELLA FIN WHITE T |
| RODA CAR BLUE P | RODA LITE YELLOW 07 | SELLA FIX E |
| RODA CAR BLUE SP/N P | RODA MAT 5801 | SELLA FIX FRD |
| RODA CAR BROWN P | RODA MAT D 5633 | SELLA FIX HPF CONC |
| RODA CAR DULL 92/N | RODA MAT ON 3090 | SELLA FIX WS CONC |
| RODA CAR FUCHSIA P | RODA MOD 5129 | SELLA FLUID BLACK HC-B |
| RODA CAR GREEN P | RODA MOD E 5595 | SELLA STAR COFFEE |
| RODA CAR JET BLACK P | RODA MOD STA | SELLA STAR COPPER |
| RODA CAR LEMON P | RODA MOD WP/KN | SELLA STAR DESERT |
| RODA CAR OCHRE P | RODA NUBUCK N2 | SELLA STAR HAVANA |
| RODA CAR OFF WHITE P | RODA OIL 1449 | SELLA STAR OLIVE |
| RODA CAR ORANGE BROWN P | RODA OIL AA 4040 | SELLA STAR SAHARA |
| RODA CAR ORANGE P/N | RODA OIL AA 4060 | SELLA STAR TOBACCO |
| RODA CAR RED BROWN P | RODA OIL DW 4050 | SELLA TEC DEO |
| RODA CAR RED P | RODA OIL KCF 673 | SELLA TEC SAFE |
| RODA CAR RED VIOLET P | RODA OIL KCF 674/2 | SELLA TEC SAFE SD |
| RODA CAR VIOLET BROWN P | RODA OIL KTA 9/A | SELLASET BLACK BR |
| RODA CAR VIOLET P | RODA OIL SF | SELLASET BLUE HN |
| RODA CAR WHITE P | RODA PENETRATOR 4019 | SELLASET BROWN M |
| RODA CAR YELLOW P | RODA PENETRATOR IE 880 | SELLASET RED H |
| RODA CARE 5616 | RODA POLIPERL BRONZE M | SELLASET YELLOW H |
| RODA CARE 5622 | RODA POLIPERL COPPER M | SELLASOL 3160 |
| RODA CARE 5638 | RODA POLIPERL GOLD M | SELLASOL BC/7 |
| RODA CARE 5659 | RODA POLIPERL IRIDESCENT | SELLASOL C6 |
| RODA CARE 5742 | RODA POLIPERL IRIDESCENT BLUE | SELLASOL CR LIQ |
| RODA CARE 5754 | RODA POLIPERL IRIDESCENT GREEN | SELLASOL FSU GRAN |
| RODA CARE C1 | RODA POLIPERL IRIDESCENT RED | SELLASOL FTF |
| RODA CARE C2B | RODA POLIPERL IRIDESCENT YELLOW | SELLASOL HFN-F GRAN |
| RODA CARE CE/N2 | RODA POLIPERL M | SELLASOL HFN-F LIQ |
| RODA CARE HF | RODA POLIPERL MICRO | SELLASOL HH-F GRAN |
| RODA CARE NC | RODA POLIPERL MICRO BRONZE | SELLASOL MI |

Declaration of compliance for hazardous and/or restricted substances

Page 11 of 15

Disclaimer:

This statement is made in good faith according to our present state of knowledge of our and our suppliers' products, their ingredients and processes, as well as the applicable regulations. There may be changes and influences beyond our control. **Our Declaration of Compliance is not and may not be interpreted as express or implied guarantee for the compliance of each and any product.** It is intended to serve as a guidance document. It does not relieve the users of our products from their responsibility to control and test the products. This Declaration of Compliance shall be valid until superseded by a later version.



Declaration of compliance for hazardous and/or restricted substances as of April 10, 2018

| | | |
|----------------------------|----------------------------|----------------------|
| RODA CARE NL | RODA POLIPERL MICRO COPPER | SELLASOL N LIQ |
| RODA CASI BLACK | RODA POLIPERL MICRO GOLD | SELLASOL NG GRAN |
| RODA CASI BLACK SUPER | RODA PUR 5008 | SELLASOL NG LIQ |
| RODA CASI BLUE | RODA PUR 5011/N | SELLASOL PR-01 GRAN |
| RODA CASI BORDEAUX | RODA PUR 5079 | SELLASOL SF |
| RODA CASI BROWN S | RODA PUR 5082 | SELLASOL TN |
| RODA CASI ECO-CITRON | RODA PUR 5101 | SELLASOL TN-FF LIQ |
| RODA CASI ECO-TANGERINE | RODA PUR 5111 | SELLATAN AG LIQ |
| RODA CASI FUCHSIA | RODA PUR 5172 | SELLATAN AR LIQ |
| RODA CASI LIGHT RED | RODA PUR 5200 | SELLATAN CF NEW LIQ |
| RODA CASI NIGHT BLUE | RODA PUR 5302/N | SELLATAN EV GRAN |
| RODA CASI OCHRE | RODA PUR 5309 | SELLATAN FB LIQ |
| RODA CASI OFF WHITE | RODA PUR 5323 | SELLATAN FL LIQ |
| RODA CASI RED | RODA PUR 5329/N CONC | SELLATAN GS-B LIQ |
| RODA CASI RED BROWN | RODA PUR 5427/N | SELLATAN HAT LIQ |
| RODA CASI TURQUOISE | RODA PUR 5610 | SELLATAN HO LIQ |
| RODA CASI VIOLET | RODA PUR 5805/N2 | SELLATAN LV CONC LIQ |
| RODA CASI WHITE 5070 EX.C. | RODA PUR 64/N | SELLATAN MBS GRAN |
| RODA CASI WHITE SUPER 861 | RODA PUR 65 | SELLATAN MBS POWDER |
| RODA CASI YELLOW | RODA PUR 76 | SELLATAN PA LIQ |
| RODA CLEAN 01 | RODA PUR 8103 | SELLATAN PT |
| RODA COOL BLACK | RODA PUR ADX | SELLATAN PW |
| RODA COOL BLUE R | RODA PUR E 5254 | SELLATAN RL LIQ |
| RODA COOL BROWN | RODA PUR EP 19/F | SELLATAN RLS LIQ |
| RODA COOL DARK BROWN | RODA PUR EP 5 | SELLATAN RP |
| RODA COOL DARK GREEN | RODA PUR EP 8/F | SELLATAN SU-V GRAN |
| RODA COOL FUCHSIA | RODA PUR IC | SELLATAN TMC |
| RODA COOL JET BLACK | RODA PUR K 312/F | SELLATAN WL-G LIQ |
| RODA COOL LEMON N | RODA PUR K 34/F | SELLATAN WL-W LIQ |
| RODA COOL LIGHT BLUE | RODA PUR K 8727/F | TANNESCO CPR LIQ |
| RODA COOL LIGHT OCHRE | RODA PUR UR 111 | TANNESCO CPR LIQ |
| RODA COOL ORANGE | RODA PUR W 1817 | TANNESCO FC |
| RODA COOL RED | RODA PUR W 5814 DULL | TANNESCO HN GRAN |
| RODA COOL RED VIOLET | RODA PUR WX | TANNESCO HN LIQ |
| RODA COOL VIOLET | RODA PUR WX 1418/F | |

Declaration of compliance for hazardous and/or restricted substances

Page 12 of 15

Disclaimer:

This statement is made in good faith according to our present state of knowledge of our and our suppliers' products, their ingredients and processes, as well as the applicable regulations. There may be changes and influences beyond our control. **Our Declaration of Compliance is not and may not be interpreted as express or implied guarantee for the compliance of each and any product.** It is intended to serve as a guidance document. It does not relieve the users of our products from their responsibility to control and test the products. This Declaration of Compliance shall be valid until superseded by a later version.



Declaration of compliance for hazardous and/or restricted substances as of April 10, 2018

Appendix - TFL chemical products containing substances of specific interest

Heavy metals

The TFL products which have metals (as in ETAD list and/or in the migration table of the EU toys directive 2009/48) as an inherent component in the structure/composition are listed in tables 1. - 3. below. Table 4. contains wetend dyes that may exceed the ETAD limits for metal impurities. Information on the type and amount of heavy metal is available in Section 3 (or section 12 of the older versions) of the SDS.

Table 1. – Wetend Chemicals containing heavy metal as inherent component

| Product name | Type of metal |
|-------------------|---------------|
| TANNESCO HN gran. | (Cr) |
| TANNESCO HN liq. | (Cr) |

Table 2. - Wet-end dyes containing heavy metals as inherent component

| Product name | Type of metal | Product name | Type of metal |
|---------------------------|---------------|--------------------------|---------------|
| SELLA COOL GREY | (Cr) | SELLA FAST HAVANA E | (Cr) |
| SELLA COOL IVORY | (Cr) | SELLA FAST OLIVE 2G | (Fe) |
| SELLA FAST BEIGE E | (Co) | SELLA FAST OLIVE SG | (Cr) |
| SELLA FAST BEIGE HF-GL | (Cr) | SELLA FAST ORANGE 2GC | (Cr) |
| SELLA FAST BLACK HBR CONC | (Cr) | SELLA FAST ORANGE RO | (Cr) |
| SELLA FAST BROWN C-G | (Co) | SELLA FAST RED BROWN A | (Cu) |
| SELLA FAST BROWN GD | (Fe) | SELLA FAST TURQUOISE 2BL | (Cu) |
| SELLA FAST BROWN H | (Cr, Co) | SELLA FAST VIOLET RL | (Cu) |
| SELLA FAST BROWN HF-G | (Cr) | SELLA STAR DESERT | (Cr) |
| SELLA FAST BROWN HF-R | (Cr) | SELLA STAR OLIVE | (Cr) |
| SELLA FAST BROWN MFR | (Cu) | SELLA STAR SAHARA | (Cr) |
| SELLA FAST BROWN OM | (Fe) | SELLASET BLACK BR | (Cr) |
| SELLA FAST BROWN OV | (Fe) | SELLASET BLUE HN | (Cr) |
| SELLA FAST GREY C-LL | (Cr) | SELLASET BROWN M | (Cr) |
| SELLA FAST DARK BROWN A | (Cu) | SELLASET RED H | (Cr) |
| SELLA FAST GREY VWL | (Cr) | SELLASET YELLOW H | (Co) |
| SELLA FAST HAVANA A | (Cu) | | |

Declaration of compliance for hazardous and/or restricted substances

Disclaimer:

Page 13 of 15

This statement is made in good faith according to our present state of knowledge of our and our suppliers' products, their ingredients and processes, as well as the applicable regulations. There may be changes and influences beyond our control. **Our Declaration of Compliance is not and may not be interpreted as express or implied guarantee for the compliance of each and any product.** It is intended to serve as a guidance document. It does not relieve the users of our products from their responsibility to control and test the products. This Declaration of Compliance shall be valid until superseded by a later version.



Declaration of compliance for hazardous and/or restricted substances as of April 10, 2018

Table 3. - Finishing dyes and pigments containing heavy metal as inherent component

| Product name | Type of metal | Product name | Type of metal |
|---------------------------|---------------|---|---------------|
| RODA CAR BLUE P | (Cu) | RODA KP BLUE | (Cu) |
| RODA CAR BLUE SP/N P | (Cu) | RODA KP BROWN | (Fe) |
| RODA CAR GREEN P | (Cu, Ba) | RODA KP DARK BROWN | (Fe) |
| RODA CAR OCHRE P | (Fe) | RODA KP OCHRE | (Fe) |
| RODA CAR ORANGE P/N | (Ba) | RODA KP WHITE | (Al) |
| RODA CAR ORANGE BROWN P | (Fe) | RODA LITE BLUE 07 | (Cu) |
| RODA CAR RED BROWN P | (Fe) | RODA LITE OCHRE 07 | (Fe) |
| RODA CAR VIOLET BROWN P | (Fe) | RODA LITE ORANGE BROWN 07 | (Fe) |
| RODA CASI BROWN S | (Cr) | RODA LITE RED BROWN 07 | (Fe) |
| RODA CASI NIGHT BLUE | (Cu) | RODA LITE VIOLET BROWN 07 | (Fe) |
| RODA CASI OCHRE | (Fe) | RODA LITE WHITE 07 | (Al) |
| RODA CASI WHITE SUPER 861 | (Al) | RODA LITE WHITE N | (Al) |
| RODA COOL BLUE R | (Cu) | RODA POLIPERL BRONZE M | (Al, Fe) |
| RODA COOL LIGHT BLUE | (Cu) | RODA POLIPERL COPPER M | (Al, Fe) |
| RODA COOL ORANGE | (Ba) | RODA POLIPERL GOLD M | (Al, Fe) |
| RODA COOL WHITE | (Al) | RODA POLIPERL IRIDESCENT (products series) | (Al) |
| RODA COR HTP BLUE | (Cu) | RODA POLIPERL MICRO (product series) | (Al) |
| RODA COR HTP DARK BROWN | (Fe) | RODA SILVER TOP 578 SF | (Al) |
| RODA COR HTP GREEN | (Ba) | SELLA DERM BLACK M2 | (Cr) |
| RODA COR HTP RED BROWN | (Fe) | SELLA DERM BORDEAUX M2 | (Cr) |
| RODA COR HTP WHITE | (Al) | SELLA DERM BROWN M2 | (Cr) |
| RODA DYE DARK BROWN NF | (Cr) | SELLA DERM FUCHSIA M2 | (Cr) |
| RODA DYE FUCHSIA NF | (Cr) | SELLA DERM LIGHT BLUE M2 | (Cu) |
| RODA DYE HAVANA NF | (Co) | SELLA DERM ORANGE M2 | (Cr) |
| RODA DYE LIGHT BLUE NF | (Cu) | SELLA DERM PINK M2 | (Co) |
| RODA DYE NAVY NF | (Cr) | SELLA DERM RED BROWN M2 | (Cr, Co) |
| RODA DYE ORANGE NF | (Cr) | SELLA DERM RED M2 | (Cr) |
| RODA DYE RED NF | (Cr) | SELLA DERM YELLOW BROWN M2 | (Cr, Co) |
| RODA DYE YELLOW NF | (Co) | SELLA DERM YELLOW M2 | (Co) |

Declaration of compliance for hazardous and/or restricted substances

Disclaimer:

This statement is made in good faith according to our present state of knowledge of our and our suppliers' products, their ingredients and processes, as well as the applicable regulations. There may be changes and influences beyond our control. **Our Declaration of Compliance is not and may not be interpreted as express or implied guarantee for the compliance of each and any product.** It is intended to serve as a guidance document. It does not relieve the users of our products from their responsibility to control and test the products. This Declaration of Compliance shall be valid until superseded by a later version.



Declaration of compliance for hazardous and/or restricted substances as of April 10, 2018

Table 4. – Wetend dyes that may exceed the ETAD limits for impurities of chromium

| | |
|-----------------------|-------------------------|
| SELLA FAST BORDEAUX A | (Cr) possibly > 100 ppm |
|-----------------------|-------------------------|

Free-formaldehyde

The following TFL Wetend products contain free-formaldehyde when analysed according to test procedure EN ISO 27587.

Table 5. - Not significant - up to 10 ppm free-formaldehyde

| | |
|----------------------|---------------------|
| SELLASOL PR-01 gran. | SELLATAN MBS powder |
| SELLASOL TN | SELLATAN PT |
| SELLASOL TN-FF liq. | SELLATAN PW |
| SELLATAN AG liq. | SELLATAN RP |
| SELLATAN FB liq. | SELLATAN SU-V gran. |
| SELLATAN GS-B liq. | SELLATAN TMC |
| SELLATAN HO liq. | SELLATAN WL-W liq. |
| SELLATAN MBS gran. | |

Table 6. - 10 – 100 ppm free-formaldehyde

| | |
|-------------------|-------------------|
| SELLASOL BC/7 | SELLATAN HAT liq. |
| SELLATAN AR liq. | SELLATAN RL liq. |
| SELLATAN EV gran. | SELLATAN RLS liq. |
| SELLATAN FL liq. | |

Table 7. - 100 – 500 ppm free-formaldehyde

| |
|-----------------------|
| INVADERM SN |
| SELLA FIX WS conc. |
| SELLATAN LV CONC liq. |

Declaration of compliance for hazardous and/or restricted substances

Page 15 of 15

Disclaimer:

This statement is made in good faith according to our present state of knowledge of our and our suppliers' products, their ingredients and processes, as well as the applicable regulations. There may be changes and influences beyond our control. **Our Declaration of Compliance is not and may not be interpreted as express or implied guarantee for the compliance of each and any product.** It is intended to serve as a guidance document. It does not relieve the users of our products from their responsibility to control and test the products. This Declaration of Compliance shall be valid until superseded by a later version.