



TFL Chemical Management Policy

A. Global Applicability

This Chemical Management Policy applies globally to TFL Ledertechnik GmbH entities and affiliates (“TFL” or “TFL group”) worldwide, including manufacturing sites, laboratories, warehouses, offices, and application facilities. TFL operates based on a local for local approach while maintaining consistent global standards for quality, safety, environmental protection, and regulatory compliance.

B. Purpose and Commitment

TFL manufactures chemical products primarily for the leather industry and is committed to responsible chemical management as part of its approach to product quality, environmental protection, occupational health and safety, product stewardship, and sustainable business practices. This commitment reflects TFL’s official philosophy of *Great Chemicals. Excellent Advice* and aligns with ISO 9001:2015, ISO 14001:2015, and the ZDHC Roadmap to Zero.

C. Regulatory and Industry Framework

TFL complies with applicable chemical, product safety, and environmental regulations, including REACH, CLP, TSCA, and equivalent regional requirements. Regulatory compliance activities are coordinated by the Global Product Compliance and Environmental Affairs department.

TFL also supports recognized industry initiatives and stewardship programs, including ZDHC Roadmap to Zero, ZDHC MRSL, AFIRM, GADSL, and where possible customer specific RSL requirements.

D. Governance and Responsibilities

Chemical management is integrated into TFL’s Group Compliance Program and Quality and Environmental Management Systems. Clear roles and responsibilities are defined, and top management provides oversight and resources. Responsibility is defined as follows:

- Research & Development (R&D)
 - evaluates technical feasibility and supports formulation approval in coordination with the Global Product Compliance and Environmental Affairs Group.
- Quality Control (QC)
 - evaluates and ensures conformity of raw materials, intermediates and products according to specifications.
- Quality Management (QM)
 - maintains the internal quality management systems, including quality management-related documentation
 - supports internal and external audits
- Procurement
 - ensures supplier qualification,
 - raw material data collection,
 - supports supplier compliance checks

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- **Product Management (PM)**
 - ensures strategic alignment of product portfolio
 - identifies market needs
 - develops marketing material for customer communication
- **Global Product Compliance and Environmental Affairs**
 - ensures compliance with chemical regulations, SDS authoring, classification, and labeling.
 - ensures compliance with ZDHC MRSL and evaluates the risk towards customer/brand RSLs
 - supports hazard and risk assessments and customer requests
 - provides official declarations to authorities
- **Environment, Health & Safety (EHS)**
 - ensures legal compliance of manufacturing according to environmental standards
 - ensures compliant protection of workers and the environment
 - ensures proper risk management, manages exposure controls and defines PPE, emergency response, and Management of Change for process-related aspects
- **Production**
 - executes manufacturing according to legal standards and internal procedures
 - implements technical and administrative controls
 - ensures state of technology protection of employees and environment
- **Human Resources (HR)**
 - maintains systems for competence, training, and awareness in cooperation with EHS, Production and Global Product Compliance and Environmental Affairs
- **Sales and Customer Service**
 - manages customer-facing communication, including support for customs and import/export documentation, and communications related to product, certification, or regulatory changes that may affect commercialization, market access, or supply continuity
 - supports customer audits

E. Life Cycle–Based Chemical Management

TFL follows a structured chemical management approach throughout the product life cycle, including hazard classification, risk assessment, operational controls, safety communication, and data management. SDS authoring and labelling are managed by Global Product Compliance and Environmental Affairs while worker and environmental protection measures are implemented by EHS and Production. Regulatory compliance is being evaluated and ensured by Global Product Compliance and Environmental Affairs.

F. Chemical Categorization and Control

All chemicals are evaluated before approval and during use. Restricted substances may only be used under controlled industrial conditions without exposure to workers and the environment, provided the relevant products comply with the ZDHC MRSL and don't contribute to RSL risks. TFL evaluates safer alternatives where feasible. Compliance assessments are supported by internal and external analytical testing.

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G. ZDHC Commitment

TFL supports the ZDHC Roadmap to Zero program and maintains systems to demonstrate MRSL compliance through documentation, testing, and verification activities. Global Product Compliance and Environmental Affairs coordinates related audits and compliance activities.

H. Supplier and Raw Material Management

Suppliers are required to provide compliant regulatory and safety information. Procurement manages supplier qualification and documentation while Global Product Compliance and Environmental Affairs evaluates materials against regulatory, ZDHC MRSL, and customer RSL requirements.

I. Management of Change

Changes to raw materials, formulations, specifications, facilities, equipment, or processes are reviewed by the relevant departments to assess impacts on compliance, certification, product quality, specifications, and market availability. Communication regarding relevant changes is supported by PM, Sales and Customer Service.

J. Manufacturing and Environmental Controls

Chemical risks are managed through ISO 14001:2015 aligned systems covering environmental impact assessment, operational controls, occupational health, waste management, emission prevention, and emergency preparedness. EHS defines appropriate engineering controls, including ventilation, PPE, exposure monitoring, waste treatment systems, and emergency preparedness measures connected to potential chemical incidents, including chemical spill response protocols, emergency eyewash stations, safety showers and clearly posted emergency contact information. Emergency response plans are periodically reviewed, and emergency drills may be conducted at least annually. EHS further advises on chemical storage in all relevant areas which shall be managed to prevent adverse reactions, contamination, and safety risks. Site specific measures align with local legal requirements. Production executes and maintains the required control measures.

K. Training and Competence

Training is coordinated by local EHS and HR functions with support from Global Product Compliance and Environmental Affairs where applicable. Training programs address chemical safety, compliance, stewardship, hazard awareness, safe handling practices, and emergency response procedures in alignment with ISO 9001:2015 and ISO 14001:2015. This may also include customer-specific workshops coordinated by PM and Sales.

L. Continuous Improvement

TFL improves its chemical management practices through management reviews, audits, performance monitoring, and cross-functional improvement activities.

M. Monitoring and Review

Performance is monitored through audits, KPIs, management reviews, regulatory compliance checks, and ZDHC verification activities coordinated by Global Product Compliance and Environmental Affairs, QM, and EHS.

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N. Policy Review

This policy is periodically reviewed by the Global Head of Product Compliance & Environmental Affairs, supported by EHS and QM, to ensure alignment with applicable regulations, standards, and stakeholder expectations.

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Abbreviations

AFIRM	Apparel and Footwear International RSL Management Group
CCO	Chief Commercial Officer
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CLP	Classification, Labelling and Packaging
COO	Chief Operating Officer
CPO	Chief People Officer
EHS	Environment, Health and Safety
GADSL	Global Automotive Declarable Substance List
HR	Human Resources
ISO 9001:2015	Standard for Quality Management Systems
ISO 14001:2015	Standard for Environmental Management Systems
KPI	Key Performance Indicators
MRSL	Manufacturing Restricted Substances List
PPE	Personal Protective Equipment
QC	Quality Control
QM	Quality Management
R&D	Research and Development
REACH	Registration, Evaluation, Authorization and Restriction of Chemicals
RSL	Restricted Substances List
SDS	Safety Data Sheet
TSCA	Toxic Substances Control Act
ZDHC	Zero Discharge of Hazardous Chemicals

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