



March 20, 2023

## Regulatory Compliance Statement

Dear Valued Customer:

This Regulatory Compliance Statement applies to all Placon Affiliate companies. The term "Affiliate" shall mean any person or entity which is owned, controlled or managed by a party, in whole or in part, or which share common shareholders, managers, employees, equipment or facilities, regardless of ownership or control. This statement includes all products made by Placon Affiliate Companies which consists of EcoStar® Polyester & Co-polyester products, Thermoformed products, Injection Molded products, BargerGard® or Tyvek® products.

### TPCH, RoHS, CPSIA, Toy Safety

Placon Corporation complies with RoHS EU Directive 2002/95/EC and 2002/95/EC revision 2.0, 2005/84/EC), RoHS3 EU Directive 2011/65/EU and revision 2015/863 of the European Parliament and of the Council of 8 June 2011, ASTM F963, 16CFR 1303, the Consumer product Safety Improvement Act of 2008 (CPSIA) heavy metals and phthalates limits, the most recent package requirements for heavy metals of the Toxic Packaging Clearing House (TPCH, formerly CONEG) legislation and the latest June 30, 2000 requirements of the European Packaging Directive EU 94/62 EC and the California Toxics in Packaging Prevention Act; namely lead, mercury, cadmium and hexavalent chromium have not been intentionally introduced into the manufacture or processing of our products.

Placon products do not contain any Ozone depleting substances including those listed in the 1990 Clean Air Act Amendments (no class I CFC's, halons, or Class II HCFC's) and the Montreal Protocol for Ozone Depleting Substances.

There is <1% Propylene Glycol (VOC) found in the food grade silicone that we utilize as a topical surfactant on our PETE materials. We dilute that to a 2% silicone and 98% distilled water to further reduce this content to trace amounts on our PETE material. No other HAP's (Hazardous air pollutants) or VOC's (Volatile Organic) materials are used in the manufacture of Placon products nor do we include sachets with anti-mold or anti humidity substances in our packaging.

### Phthalates

Placon Corporation certifies that we do not use or purchase materials know to contain BPA (Bisphenol A) or Phthalates in our products or in other purchased materials used in our manufacturing process.

No di-(2-ethylhexyl) phthalate (DEHP), dibutyl phthalate (DBP), benzyl butyl phthalate (BBP), di-isononyl phthalate (DINP), di-isodecyl phthalate (DIDP), or di-n-octyl phthalate (DnOP), or di-ethylhexyl adipate or any other phthalate or adipate additives are used in the manufacture of Placon products supplied to your company.

No arsenic, barium, selenium, asbestos, allergens, azo colorants and azodyes, fluoride (2002/61/EC compliant), (BPA (bisphenol A), dimethyl fumarate, alkyl phenols (octyl and nonyl), glycol ethers, barium, benzene, methyl bromide, brominated compounds, BTHC (butyryltriethylcitrate), short chain chlorinated paraffins, chlorine bleach, dibutyl hydrogen borate (DBB), Grinsted Soft-N- safe (Danisco) (fully acetylated\_monoglyceride based on hydrogenated castor oil), hexabromocyclododecane (HBCDD), titanium acetate, hexachlorobenzene (HCB), hexachloroethane, Hexamol DINCH (1,2-cyclohexane dicarboxylic acid, di-isononyl ester), melamine, isopropyl thixanthone, BHT, BHA, natural rubber latex or dry rubber latex, 21CFR Part 189 Pesticides, Insecticides, Rodenticides, fungicides, alkyl  
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phenol ethoxylates (octyl and nonyl), or butyl benzyl phthalates, polycyclic aromatic hydrocarbons (PAH), PFOS (perfluorooctane sulfonate) or PFOA (perfluoro-octanoic acid) (complies with 2006/122/ECC.), radioactive substances, bis (tributyl tin) oxide (CAS No. 56-35-9), TOTM [tri-(2-ethylhexyl) trimellitate], trichlorobenzene, Zonyl or other fluorinated telomer-based compounds, additives or coatings are used in the manufacture of Placon products supplied to your company.

Products that Placon manufactures do not contain per- and poly-fluoroalkyl substances (PFAS), except those monomers, which are explicitly regulated and authorized in Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food. This information is based on the chemistry of the used raw materials and our supplier's information regarding their compliance. The presence of ubiquitous traces of undesired products can however not totally be excluded

### **Conflict Minerals**

None of the "Conflict Minerals" as outlined in the Wall Street Reform and Consumer Production Act are used in the manufacture of Placon products.

### **Proposition 65**

The California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65) requires that companies provide a clear and reasonable consumer product, workplace, or environmental warning for significant exposures to chemicals known to the State of California to cause cancer or reproductive toxicity. None of these Proposition 65 chemicals are introduced or used in the thermoforming of Placon products. That being said there are trace amounts of antimony in PET products as it is used as a catalyst during the polymerization phase of PET that we purchase and convert into packaging.

Based on the information provided by our suppliers of Styrene materials, the raw material used for the HIPS roll stock is manufactured using raw material that has chemical substances listed in California Proposition 65 implemented by the office of environment health hazard assessment of California Environmental protection agency as listed on August 5, 2016 i.e., Ethylbenzene listed on June 11, 2004 and Styrene listed on April 22, 2016. California Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986) WARNING: This Styrene product contains a chemical(s) known to the State of California to cause cancer.

Component	CAS #	Amount
Ethylbenzene	100-41-4	<= 250 PPM
Styrene	100-42-5	<= 700 PPM

### **TSE/BSE**

Placon products and other materials purchased comply with European Union legislation for medical device packaging incorporating animal materials.

### **TSCA**

Based on information provided by our suppliers, Placon products and other materials purchased comply with the Regulation of Persistent, Bio-accumulative, and Toxic Chemicals under TSCA Section 6H.

### **EU MDR Regulation 2017/745**

Placon does not manufacture a medical device according to the MDR or FDA definitions

### **REACH**

Concerning the EU European Union's REACH legislation 1907/2006 (Registration, Evaluation, and Authorization of Chemicals), all Placon products are "articles" and all comply with the REACH legislation including compliance with Annex XIV, Annex XV, and Annex XVII substances (SVHC) content, REACH Group 1 & 2 SVHC's and proposed SVHC's released through January 17, 2023. Therefore, all Placon products are free to be imported into Europe without registration.

Placon's EcoStar® polyester (PET & other co-polyesters) materials containing post consumer content cannot be certified to the above because the recycle content may not be completely traceable; however we have no reason

to believe that these materials would not comply with all of the regulations. Placon does not intentionally add any of the chemicals of concern into our EcoStar® materials or purchased materials that we use for packaging.

Placon products are manufactured in an allergen free environment and we do not introduce any allergens such as wheat/gluten, milk, eggs, peanuts, tree nuts, fish, shellfish, soy or latex.

All Placon Corporation products are proudly produced using Good Manufacturing Practices and are considered non-toxic and non-hazardous.

Sincerely,

A handwritten signature in blue ink that reads "Mark Markham". The signature is written in a cursive, flowing style.

Mark Markham  
Director of Quality