



Regulatory Information for articles produced by NMC

Note

This version supersedes and replaces version RI-010 ISO.

The English version of our Product Stewardship declaration is the only legally binding reference document. Translations into other languages have no legal basis.

REACH / SVHC / SCIP

In accordance with Article 33(1) of Regulation (EC) No 1907/2006, suppliers of articles containing SVHCs published in the official ECHA Candidate List in concentrations above 0.1% w/w must provide their customers with sufficient information to allow safe use of the article, including at least the name of the substance.

The articles listed in Annex I of this communication do not contain Candidate List substances (latest update 25.06.2025) in concentrations above 0.1% w/w and are therefore not subject to proactive notification. Hence, we do not make a communication under Article 33 of the REACH Regulation. Therefore, we are not required to notify any articles in the ECHA SCIP database.

Furthermore, based on current information from our upstream suppliers, we hereby declare that the references provided do not contain any substances listed in Annex XIV, i.e. substances subject to authorization, and that we comply with the restrictions under Annex XVII of the REACH Regulation.

European Regulations and Directives

For the manufacturing of products listed in Annex I of this letter we do not intentionally add substances listed in the following European Regulations / Directives:

- 2024/590/EU (Ozone Depleting Substances (ODS))
- 2024/573/EU (fluorinated greenhouse gases)
- 2019/1021/EU (Persistent Organic Pollutants (POPs))
- 2017/821/EU (Conflict minerals)
- 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS)
- 2023/1115/EU (EU Deforestation Regulation (EUDR))
- 2023/2055/EU (synthetic polymer microparticles)
- 94/62/EC on Packaging and Packaging waste
 - o The sum of Lead (Pb), Cadmium (Cd), Mercury (Hg) and Chromium VI (Cr (VI)) concentrations is lower than 100 ppm.
 - o *EN 13428: Prevention by source reduction*
The density and design of our products have been optimized to ensure maximal material performance and minimal use of raw materials, incl. packaging.
 - o *EN 13429: Packaging – Re-use*
Reusable packaging materials are promoted whenever available.
 - o *EN 13430: Packaging – Possibilities of materials recycling*

All packaging materials can be recycled through recognized and well-established recycling routes. We strive towards the use of packaging materials containing the highest recycled content available on the market whilst ensuring the highest performance quality.

- *EN 13431: Energy Recovery*

All packaging materials can be used for energy recovery.

- *EN 13432: Packaging recoverable through composting and biodegradation*

Plastic packaging materials used are neither compostable nor biodegradable. Paper and carton packaging materials should preferentially be recycled through recognized and well-established recycling routes.

Substances or substance groups

For the manufacturing of the products listed in Annex I of this letter we do not intentionally add the following substances / substance groups:

- Alkylphenol ethoxylates (APEO)
- Asbestos
- Bisphenol A
- Chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs)
- Dimethyl fumarate
- Endocrine disruptors
- Formaldehyde
- Heavy metals (ex. Cd, Cr (VI), Hg, Pb)
- Hexabromocyclododecane (HBCDD)
- Mineral Oil Saturated Hydrocarbons (MOSH) and Mineral Oil Aromatic Hydrocarbons (MOAH)
- Nanoparticles
- Organotin compounds
- Per- and polyfluoroalkyl substances (PFAS) including Perfluorooctanoic acids (PFOA) and Perfluorooctanesulfonic acids (PFOS)
- Persistent, Bioaccumulative and Toxic substances (PBT)
- Phthalates
- Polycyclic Aromatic Hydrocarbons (PAH)
- PVC
- Short-chain chlorinated paraffins (SCCPs) and medium-chain chlorinated paraffins (MCCPs)
- Very Persistent and very Bioaccumulative substances (vPvB)

Circular economy is at the core of each of our foam solutions designs. Design for recyclability and the use of recycled materials support our commitment to reduce the carbon footprint of our foam solutions. Most of them contain a certain percentage of recycled content. We carefully source these recycled materials from responsible European suppliers. Recycled materials are variable. To the best of our knowledge these high-quality recycled materials comply with the below listed norms and legislations.

For directives, regulations, and substances other than those listed above, NMC does not dispose of all the necessary information. Above listed statements are based on our current understanding of the regulatory requirements, our production processes and information provided by our material suppliers. Though



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dangerous substances are not added intentionally, the presence of impurities or insignificant traces due to contamination of materials cannot be excluded.

Eynatten, July 2025

Florent Pouzet
CEO

Disclaimer:

This Product Stewardship declaration has a validity of 1 year starting from the date of signature.
The information provided is based on our current understanding of the regulatory requirements, our production processes and information provided by our material suppliers. It doesn't constitute in any matter a guarantee, nor does it engage in any way NMC's liability.
The customer bares the responsibility to check suitability of the products listed below for their intended use.

Annex I : Concerned product ranges(*)

Product Ranges
CLIMAFLEX® NATUREFOAM
CLIMAFLEX® NATUREFOAM EASY
CLIMAFLEX® UK
CLIMAFLEX® PREMIUM
CLIMAFLEX® NATUREFOAM EXZENTRO
CLIMAFLEX® SPIRAL
CLIMATUBE® ZIP
CLIMATUBE® EASY
CLIMATUBE® BASIC
CLIMATUBE® PROTECT
DOGBONES
CLIMAFLEX® NATUREFOAM STABIL
CLIMAFLEX® PREMIUM STABIL
CLIMAFLEX® BASIC STABIL

(*) Check Annex II for specific product references, which are excluded from the statements listed above.

Annex II: Excluded product ranges

The following product ranges are excluded from the statements listed above:

Product ranges
CLIMAFLEX® ROLL
CLIMAFLEX® SYSTEM
CLIMAFLEX® SILENCE
CLIMAFLEX® PROTECT
CLIMATUBE® SILENCE

Please contact our customer service for further information.