

Regulatory Information for Nomapack® articles produced by NMC

Note

This version supersedes and replaces version RI-010 NTEC.

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.

Based on our current knowledge as well as the information provided by our upstream suppliers—who are legally obligated under Article 33 of REACH to inform us of the presence of any SVHC— we hereby declare that the products referenced in Annex I do not contain any Substances of Very High Concern (SVHC) from the ECHA Candidate List at concentrations above 0.1% w/w with the exception of products in the annex III which contain DBDPE above this threshold.

Furthermore, according to the information available to us, all NOMAPACK products do not contain any substances listed in Annex XIV (substances subject to authorisation) and comply with the restrictions laid down in Annex XVII of the REACH Regulation. This declaration is based on supplier documentation, regulatory obligations, and our current state of knowledge; we do not perform systematic analytical testing, and therefore this statement is provided in good faith and will be updated if new information or regulatory changes arise.

Regarding the product in annex III, **DBDPE (1,1'-(ethane-1,2-diyl)bis[pentabromobenzene])** has been identified by ECHA as very persistent and very bioaccumulative (vPvB) under Article 57e on 5th November 2025. Some product ranges of our NOMATEC segment require flame retardants for their intended use, which is why DBDPE is present in certain products (see annex III for more details about concerned product ranges).

NMC has fulfilled its SCIP notification obligations. The SCIP registration number is provided in Annex III. In parallel, we are working intensively to adapt our formulations and remove DBDPE from our products. We expect these changes to be implemented within the next few months and will notify you once completed.

European Regulations and Directives

For the manufacturing of products listed in Annex I & II 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)
- 2025/40/EU 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.

Substances or substance groups

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

- o Alkylphenol ethoxylates (APEO)
- o Asbestos
- o Aziridine
- o Biocide
- o Bisphenol A
- o Chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs)
- o Dimethyl fumarate
- o Endocrine disruptors
- o Heavy metals (ex. Cd, Cr (VI), Hg, Pb)
- o Hexabromocyclododecane (HBCDD)
- o Mineral Oil Saturated Hydrocarbons (MOSH) and Mineral Oil Aromatic Hydrocarbons (MOAH)
- o Nanoparticles
- o Per- and polyfluoroalkyl substances (PFAS) including Perfluorooctanoic acids (PFOA) and Perfluorooctanesulfonic acids (PFOS)
- o Persistent, Bioaccumulative and Toxic substances (PBT)
- o Phthalates
- o Polycyclic Aromatic Hydrocarbons (PAH)
- o PVC

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

Eynatten, August 2026



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
NOMA® PROTECT Tuff Pad
NOMAPACK® U
NOMAPACK® WS
NOMAPACK® L
NOMAPACK® PAD
NOMAPACK® SYSTEM
NOMAPACK® C
NOMAPACK® R

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

Annex II: Excluded products

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

Product code	Specific product reference from the following product range
3006512	Nomatec® XPE
3006513	Nomatec® XPE
3006611	Nomatec® XPE
3015969	Nomatec® XPE
3049289	Nomatec® XPE
3016176	Nomatec® XPE
3046701	Nomatec® XPE
3006520	Nomatec® XPE
3006580	Nomatec® XPE
3049639	Nomatec® XPE
3049177	Nomatec® XPE
3049640	Nomatec® XPE

Please contact our customer service for further information.

Annex III: SCIP registration

Product range	SCIP reference number	DBDPE 84852-53-9
NOMAPACK O	b6943e68-ec29-4669-9821-29fce8a265f1	Yes
NOMAPACK [app] SC	8ae6437c-c58f-4305-b4e1-aeff329834e7	Yes

