

Regulatory Compliance Declaration MIGS® / Polyfuze® Polymer Fusion Label Technology

DISCLAIMER

Polymer Fusion Labeling Technology is supplied as a raw material and becomes an integral part of the finished polyolefin thermoplastic product through the fusion process. Once fused, the label cannot be mechanically separated into different materials, eliminating the potential for material migration through damage or removal. Consequently, the entire product should be considered a homogeneous material for compliance purposes.

For detailed guidance on RoHS & EU chemical compliance thresholds, including how compliance calculations can be performed for restricted substances within a homogeneous material, please refer to our MIGS PGC RoHS & EU Chemical Threshold Guidance document.

Testing and Compliance Responsibilities:

- We recommend that all necessary compliance testing, particularly for the detection of prohibited materials, be conducted on the finished product by the customers. This ensures that the product meets all regulatory requirements for its intended use.
- Any testing of the Polymer Fusion Labeling as a raw material by third parties or external customer facilities requires a signed Mutual Non-Disclosure Agreement (MNDA) with Mold In Graphic® Systems / Polyfuze® Graphic Corporation.
- Once labels are applied to a substrate in accordance with our General Terms & Conditions, they are no longer covered by the MNDA.

Analytical Testing:

Mold In Graphic® Systems / Polyfuze® Graphic Corporation does not perform analytical testing on raw materials. We rely on Certificates of Analysis (CofA) and Safety Data Sheets (SDS) provided by our suppliers. It is the responsibility of end-users to determine specific application and compliance requirements for their products.

Regulatory & Compliance Overview:

- **FDA Compliance:** A homogeneous label, fused into the plastic itself, eliminates adhesives, inks, and coatings that could leach or contaminate food-contact surfaces. This ensures compliance with FDA 21 CFR 174-178 for indirect food contact applications.
- **RoHS & REACH Compliance:** Unlike traditional labels that may include restricted substances in their construction, a homogeneous Polymer Fusion Label eliminates risk by becoming an integral part of the base material, ensuring compliance with RoHS Directive 2011/65/EU and REACH Annex XVII.
- **NSF & Other Certifications:** Many food and beverage containers, packaging, and processing components require NSF certification or similar approvals. Having a single-material construction simplifies compliance and certification.

Homogeneous Material Compliance & Regulatory Testing:

Since Polymer Fusion Labels become part of the overall plastic product, regulatory testing must be conducted on the entire finished product, rather than as an independent label.

- **For RoHS Compliance:**
 - Restricted substances with hard bans (e.g., Mercury, PBBs, PBDEs) must not be present at all.
 - Threshold-regulated substances (e.g., Cadmium: 100 ppm, Lead Chromate: 1000 ppm) are evaluated in the final product's homogeneous material composition.
 - MIGS/PGC calculates compliance by determining the proportion of any restricted substance in the Polymer Fusion Label formulation, relative to the size and weight of the final product to ensure overall compliance within allowable concentration limits.

For a more detailed explanation of threshold-based compliance calculations, please refer to our MIGS PGC RoHS & EU Chemical Threshold Guidance document.



Regulatory Compliance Declaration MIGS® / Polyfuze® Polymer Fusion Label Technology

FDA

When requested, Polymer Fusion Labeling can be formulated to meet FDA compliance standards and may be safely used in applications governed by 21 CFR 174.5. We ensure that materials identified as prohibited on the Restricted Substances Specifications are neither used in the manufacture nor intentionally added during the formulation of Polymer Fusion Labeling Technology. Therefore, their presence in the finished product is not anticipated.

RoHS

Many Polymer Fusion Label programs utilizing restricted substance pigments in their manufacture will meet or surpass maximum parts per million (ppm) requirements listed in the European Union's Directive 2011/65/EU (RoHS Recast or RoHS 2) and its amendments, including (EU) 2015/863 and (EU) 2024/232. These directives restrict the use of certain hazardous substances in homogeneous materials in electrical and electronic equipment:

- Lead, mercury, hexavalent chromium < **1000 ppm by weight of homogeneous material.**
- Cadmium < **100 ppm by weight of homogeneous material.**

In applications where robust durability is a requirement, it is recommended that ppm calculations be conducted on the homogeneous material (manufactured polyolefin thermoplastic product with fused Polymer Fusion Label) to discover ppm concentration prior to requesting less durable RoHS compliant pigments.

For detailed guidance on RoHS & EU chemical compliance thresholds, including how compliance calculations can be performed for restricted substances within a homogeneous material, please refer to our MIGS PGC RoHS & EU Chemical Threshold Guidance document.

RoHS compliant pigments can be used in place of restricted substance pigments but are typically less durable for use in certain applications. These pigments comply with the chemical restrictions of China RoHS. Other restricted substances such as bis(2-ethylhexyl) phthalate (DEHP), butyl benzyl phthalate (BBP), dibutyl phthalate (DBP), diisobutyl phthalate (DIBP), tetrabromobisphenol A (TBBPA), and medium-chain chlorinated paraffins (MCCPs) are not used in the manufacture of Polymer Fusion Labeling, so their presence is not expected.

It's important to stay compliant with all current EU RoHS requirements and be aware of ongoing amendments and exemptions that may impact your product categories.

CPSIA

Polymer Fusion Labeling by Mold In Graphic® Systems / Polyfuze® Graphic Corporation does not use phthalates in its formulation. Upon request, our polymer fusion labeling can be formulated to meet the specific safety requirements of the Consumer Product Safety Improvement Act (CPSIA) of 2008 for children's products, which includes compliance with regulations on lead and phthalates. Since Polymer Fusion Labeling is integrated into the final product, a General Conformity Certificate (GCC) is typically not required for the labeling itself. Instead, the manufacturer of the finished product is responsible for ensuring that the complete product complies with CPSIA and, if applicable, for providing a GCC or Children's Product Certificate (CPC) that covers the entire product.

SDS (formerly MSDS)

Polymer Fusion Labeling is classified as non-hazardous and is not subject to the requirements of Safety Data Sheets (SDS – formerly MSDS). This classification is in accordance with the OSHA Hazard Communication Standard (29 CFR 1910.1200), European Union Regulation (EC) No. 1272/2008 (CLP Regulation), and Regulation 2020/878 which amends Annex II of REACH to incorporate the latest revisions of the Globally Harmonized System (GHS).

Our products do not contain substances that trigger SDS obligations under the mentioned regulations, nor do they pose physical, health, or environmental hazards that necessitate such documentation. Consistent with these guidelines, Polymer Fusion Labeling ensures that all components and formulations used are safely managed and do not require additional hazard communication in the form of Safety Data Sheets globally.

Regulatory Compliance Declaration MIGS® / Polyfuze® Polymer Fusion Label Technology

CONFLICT MATERIALS

Mold In Graphic® Systems / Polyfuze® Graphic Corporation has conducted a good faith determination regarding the applicability of the Conflict Minerals Rule as per the U.S. Dodd-Frank Act and has determined that the rule does not apply to our operations for the following reasons:

- **Non-Reporting Entity:** Mold In Graphic® Systems / Polyfuze® Graphic Corporation is not a reporting company under the SEC rules and therefore is not subject to the reporting requirements of the U.S. Dodd-Frank Act regarding conflict minerals.
- **No Use of Conflict Minerals:** Our products, including Polymer Fusion Labeling technologies, do not contain conflict minerals (columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives such as tantalum, tin, and tungsten). These minerals and their derivatives, as identified in Public Law 111-203 and enumerated in the Federal Register (77 FR 56273, 56285), are not present in any materials used in our manufacturing processes nor in those used by any contract manufacturers producing goods for our company.

Consequently, Mold In Graphic® Systems / Polyfuze® Graphic Corporation is not required to undertake further action, make additional disclosures, or submit any reports concerning the Conflict Minerals Rule. Our due diligence and inquiry concerning compliance with this rule are complete and conclude that we are in full compliance based on our current operations and supply chain management.

Please refer to MIGS PGC Conflict Materials Reporting Template (CMRT v6.4) for more information.

PROP 65

Products from Mold In Graphic® Systems / Polyfuze® Graphic Corporation may contain traces of chemicals listed on the current Proposition 65 List of Chemicals, effective December 29, 2023. However, materials prohibited on our Restricted Substances Specification are not used in the manufacture or formulation of Polymer Fusion Labeling Technology. This technology is produced in a raw material state and once molded into polyolefin products, are fused into the polyolefin thermoplastic product, part, or component, rendering them integrated and stable and not subject to California Proposition 65. No restricted substances are intentionally added, thus their presence is not expected.

Mold In Graphic® Systems / Polyfuze® Graphic Corporation relies on Certificates of Analysis (CofA) and Safety Data Sheets (SDS) provided by our suppliers to verify compliance. We recommend that any further testing required to validate the absence of prohibited materials be performed by our customers on the Polymer Fusion Labeling once applied to customer parts.

CBAM

Polymer Fusion Labeling by Mold In Graphic® Systems / Polyfuze® Graphic Corporation is not subject to the EU's Carbon Border Adjustment Mechanism (CBAM) as it does not fall into the categories of products regulated under this mechanism.

TSCA / PFAS

Applicable to products developed and manufactured by Mold In Graphic® Systems (MIGS) and Polyfuze® Graphics Corporation (PGC)

Mold In Graphic® Systems (MIGS) and Polyfuze® Graphics Corporation (PGC) are committed to regulatory transparency and compliance with applicable global chemical regulations, including the U.S. Toxic Substances Control Act (TSCA) and evolving guidance concerning Per- and Polyfluoroalkyl Substances (PFAS).

We do not intentionally formulate our Polymer Fusion Labeling technologies with TSCA-restricted or PFAS-classified substances. However, due to differences in formulations across our divisions:

Regulatory Compliance Declaration MIGS® / Polyfuze® Polymer Fusion Label Technology

- Polyfuze® Graphics Corporation (PGC): Based on available Safety Data Sheets (SDS) and Certificates of Analysis (CoA) from raw material suppliers, PGC products are not expected to contain PFAS and do not include any intentionally added PFAS.
- Mold In Graphic® Systems (MIGS): One adhesive component used in the production of MIGS Graphic® products contains PTFE (polytetrafluoroethylene), a fluorinated polymer classified as a PFAS. Our supplier has stated that this PTFE is REACH-compliant and present at concentrations below 25 parts per billion (ppb). While minimal, this level may still be considered reportable under broad PFAS definitions and may require customer-specific disclosures.

Please note:

- We do not conduct independent analytical testing for PFAS content.
- Our compliance statements are based solely on supplier-provided documentation, including SDS and CoAs.
- We do not currently plan to implement PFAS-specific analytical testing.

It is the responsibility of downstream users to evaluate the suitability of our products in meeting their specific regulatory obligations and customer requirements.

REACH/SVHC

As of January 2024, Polymer Fusion Labeling does not contain any of the 240 substances identified by the European Chemicals Agency (ECHA) as Substances of Very High Concern (SVHC). These substances, which include 2,4,6-tri-tert-butylphenol, 2-(2H-benzotriazol-2-yl)-4-(1,1,3,3-tetramethylbutyl) phenol, and dibutyl phthalate, are known for their reproductive toxicity, persistence, and bioaccumulation potential.

Classified as an "article" under EU Regulation (EC) No. 1907/2006 (REACH), Polymer Fusion Labeling is integrated into polyolefin thermoplastic products and does not release chemical substances, exempting it from REACH registration requirements.

This product complies with all current restrictions under Annex XVII of REACH, demonstrating our dedication to environmental stewardship and consumer safety.

SCIP Compliance

Polymer Fusion Labeling, developed and manufactured by Mold In Graphic® Systems / Polyfuze® Graphic Corporation, is designed to fully integrate with polyolefin thermoplastic products, parts, or components. Consistent with European Union Waste Framework Directive (WFD) and under the provisions of the SCIP (Substances of Concern In articles as such or in complex objects Products) database managed by the European Chemicals Agency (ECHA), this integration classifies our products as "articles."

POP Regs

Stockholm Convention on Persistent Organic Pollutants (POPs) restricted substances are not knowingly used in the manufacture of Polymer Fusion Labeling, so their presence is not expected. Mold In Graphic® Systems / Polyfuze® Graphic Corporation relies on certifications of analysis (CofA) and Safety Data Sheets (SDSs) provided by suppliers to confirm compliance. End-users are responsible for determining the application and compliance requirements for the intended use(s) of their product with respect to the Stockholm Convention on POPs.

GADSL

GADSL Compliance Commitment

Mold In Graphic Systems® / Polyfuze® Graphics Corporation is committed to full compliance with the Global Automotive Declarable Substance List (GADSL). This ensures our automotive products adhere to international safety and environmental standards, promoting transparency and responsible manufacturing practices.

Regulatory Compliance Declaration MIGS® / Polyfuze® Polymer Fusion Label Technology

Substances Managed Under GADSL:

- Heavy Metals: For specific details on how we manage lead and cadmium in our products, please refer to our RoHS compliance statement on page 1 of this document.
- Other Regulated Substances: It's important to note that our Polymer Fusion Labeling does not contain phthalates, flame retardants (specifically PBBs and PBDEs), aromatic amines, asbestos, nickel, or formaldehyde.

Certification and Compliance:

We certify that none of the following substances are used in the manufacture of our products:

- Flame retardants (specifically PBBs and PBDEs)
- Aromatic amines
- Asbestos
- Nickel
- Formaldehyde

This certification underscores our proactive approach to ensuring that all materials used are safe for their intended use and comply with the stringent requirements set forth by the automotive industry.

Product Safety and Compliance:

Our commitment to product safety and environmental stewardship is unwavering. We use only materials that meet or exceed the comprehensive safety and environmental standards required under GADSL. We continuously work to improve the sustainability and safety of our products.

Testing and Documentation:

To verify compliance with GADSL, we rely on Certificates of Analysis (CofA) and Safety Data Sheets (SDS) from our suppliers. Our rigorous quality control processes are designed to ensure that no prohibited substances are present in our products. We encourage end-users to perform additional testing as needed to validate compliance for their specific applications.

Final Considerations:

Each application is unique, and we work with customers to determine the best approach based on their specific regulatory and performance requirements. If additional testing or documentation is required, we are happy to assist in compliance verification.

For specific guidance on RoHS & EU Chemical Compliance Thresholds, please see our MIGS PGC RoHS & EU Chemical Threshold Guidance document.



Wyatt Stevenson
Quality Assurance
Office: (928) 634-8838