

AKU

trekking & outdoor footwear

CODE OF CONDUCT

AKU Italia Srl
2022

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AKU has always testified to an indissoluble bond with the Italian artisan manufacturing tradition, from which the profound production experience of its founder Galliano Bordin originates.

A fundamental value in the history of the company, which is found in the high quality of the products, designed to ensure, without compromise, the maximum functional performance in terms of comfort and durability.

“WE FEEL PART OF A SINGLE ECOSYSTEM, SOCIAL AND ENVIRONMENTAL. WE FEEL RESPONSIBLE FOR ITS BALANCE.”

This short sentence summarizes the sense of AKU’s commitment as a social entity, as well as an industrial company. A commitment that goes beyond the simple fact of producing outdoor footwear capable of respecting the highest functional performance and which is expressed, in terms of environmental sustainability, in the constant search for innovative design solutions, aimed at containing the environmental impact, to promote the responsible use and reuse of resources, with a view to increasingly focused on the principles of the circular economy and therefore protection of the environment.

We aspire to involve and activate people for environmental protection by means of our communication with which responsible use of products and the respect of nature should be promoted.

“WE LIKE TO THINK THAT WHOEVER BUYS OUR PRODUCTS IS A CONSCIOUS USER OF AUTHENTIC AND FUNCTIONAL MANUFACTURED GOODS, NOT SIMPLY THE END-CONSUMER OF STUFF. A RESPECTFUL ETHICAL PRODUCT, WITH REAL VALUE MADE TO LAST IN TIME.”

AKU together with its proper suppliers has an important responsibility to take care of nature and our environment and ensure that all people and animals that are a part of our processes are treated lawfully and in a morally and ethically correct manner.

**NATURE IS
CALLING
react
RESPONSIBLY**

We have adopted a Code of Conduct - a binding document that describes the values and principles that we follow, and all our suppliers and business partners are required to read, follow and respect and to further by implementing the values with their respective supply chains.

Our Code of Conduct is based on current international conventions and standards, including:

- The United Nations Global Compact
- The United Nations Universal Declaration of Human Rights
- The International Labour Organisation’s Declaration on Fundamental Principles and Rights to Work
- The United Nations Convention against Corruption
- The United Nations Convention on the Rights of the Child
- The United Nations Sustainable Development Goals, in particular:



1. LEGAL COMPLIANCE

AKU, our suppliers and business partners follow all applicable laws and regulations in the country where they operate. Should any of the requirements by us be in violation of the national law in any country or territory, the law in that country takes precedence over the Code of Conduct, unless it violates general ethical and universal principles. In this case, immediate reporting to us is necessary so a decision can be made regarding how to proceed. In cases where legal requirements are less strict than the Code of Conduct, the Code shall prevail.

2. ENVIRONMENT AND ANIMAL WELFARE

NATURE CONSERVATION AND ENVIRONMENTAL PROTECTION ARE OF THE HIGHEST IMPORTANCE FOR US.

Our primary contribution to the environment is that we produce and sell products of high quality that have a long-life span. We do not believe in the kind of consumption where products of limited life length need to be constantly replaced. We do not tolerate any form of animal mistreatment, and we support animal welfare and that all animals are treated with respect and have the right to a life in dignity.

Please take note of the herewith enclosed details on our **Animal Welfare Policy**. (See Annex 1)

We also expect our suppliers to make every effort to protect the environment and to keep the impact their activities have on it as low as possible. All concerned parties and business partners must comply with all applicable environmental laws and regulations in the country of operation or manufacture of products. As we do, also our suppliers must minimise their environmental impact and make continuous improvements in environmental protection. In general, this means: responsible handling of hazardous substances and other chemicals, decreasing or preventing waste, reducing emissions from operations, minimizing the use of natural resources and avoiding adverse impacts on biological diversity.

3. LABOUR AND EMPLOYMENT

NO CHILD LABOUR

We do not accept child labour. All operator and supply chain members shall only employ workers according to applicable laws and regulations. The minimum employment age is laid down in several conventions of the International Labour Organization (ILO), which regulates internationally recognised valid lower limits. If a higher minimum employment age is valid in the country in which a supplier maintains its business premises, then the supplier must adhere to it.

EMPLOYMENT RIGHTS

The fundamental employment rights established by a number of international conventions from the United Nations and the International Labour Organization (ILO) must be respected.

- No Discrimination

We do not accept discrimination with regards to ethnicity, skin colour, religion, age, sexual orientation, gender, national origin, disability, political orientation or other classes protected by law. Equal opportunities for and treatment of employees irrespective of the above-mentioned factors shall be promoted. Diversity shall not be limited in any way.

- No Forced Labour

We do not tolerate forced and compulsory labour. By that we mean any form of work that is not carried out voluntarily or based on a mutual agreement between the employee and employer, including any form of bonded labour, serfdom slavery or slave-like practices, trafficking in human beings or any other involuntary labour and services that are not in conformity with internationally recognized labour and social standards. All work must be without threat of punishment. Employees must be able to terminate their work or employment at any time.

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

The employees' right to freedom of association and collective bargaining shall be respected. Neither favour nor discrimination against members of employee organisations or trade unions is accepted. An enabling environment to ensure that employees can exercise their rights in a lawful and peaceful manner shall be provided.

WORKING HOURS

Local limits and regulations on work hours must not be exceeded and the fundamental levels as stated in ILO conventions are to be respected and followed.

COMPENSATION / WAGES

All employees shall be paid regularly and on time. Employees must receive at least the national statutory minimum wage, the prevailing industry wage or the wage that is negotiated in a collective agreement, whichever is the highest. A fair and comfortable wage, in order to allow a decent life for workers, should be paid. We do not accept deductions as a disciplinary measure. It is only to be made when provided for by the national law.

RESPECTFUL TREATMENT

All employees shall be treated with respect and dignity. Under no circumstances do we accept the use of offensive or degrading treatment or corporal punishment. No employee shall be subject to physical, sexual, psychological, or verbal harassment or abuse. Employees shall be free to lodge complaints with their superiors. The personal integrity, dignity, right to a private life and other personal rights of every individual shall be respected, and all forms of violence and assault in the workplace, including threatening behaviour from the employee shall be prohibited.

LABOUR CONTRACTS

The employees' awareness of their legal rights and obligations shall be ensured. All employees shall be entitled to a written employment contract.

SPECIAL PROTECTION FOR YOUNG WORKERS

Young workers being aged under 18 years, shall be protected against conditions of work, which are prejudicial to their health, safety, morals, and development.

Where young workers are employed, it should be ensured that (a) the kind of work is not likely to be harmful to their health or development; (b) their working hours do not prejudice their attendance at school, their participation in vocational orientation approved by the competent authority or their capacity to benefit from educational training or instruction programs.

HEALTH AND SAFETY

Responsibility must be taken for the health and safety of all employees at their place of work. All employees deserve to work in a safe and healthy work environment.

Necessary precautions shall be taken against accidents and damage to health that may arise in connection with occupation by establishing and applying appropriate occupational health and safety systems. Excessive physical or mental fatigue shall be prevented by appropriate measures. Additionally, employees are expected to be regularly informed and trained about applicable health and safety standards and measures. Employees must be provided with access to drinking water in sufficient quantity and access to clean sanitary facilities.

4. PRODUCT AND COMPONENTS

RAW MATERIALS SELECTED ON THE BASIS OF THE HIGHEST QUALITY STANDARDS AND SPECIAL ATTENTION TO THE ISSUE OF ENVIRONMENTAL IMPACT ARE THE BASIS OF AKU'S DESIGN AND PRODUCTION APPROACH.

IN THIS WAY, EVERY SINGLE MODEL REPRESENTS A PRODUCT OF ABSOLUTE EXCELLENCE, ETHICALLY CORRECT, DESTINED TO BECOME THE IRREPLACEABLE COMPANION OF YOUR ADVENTURES IN NATURE FOR A LONG TIME.

RAW MATERIALS

AKU has always paid particular attention to the choice of high-quality raw materials which is one of the most important characteristics of AKU production.

Therefore, national and international environmental standards shall be the guiding principles. In particular, we expect that all raw materials and components for the production of our products are compliant with the most recent REACH regulations and that all suppliers comply to AKU's regularly updated **Consumer Product Restricted Substances List** (RSL) (See Annex 3), describing the most recent scientific test method for individual chemicals that may or may not pose a threat to human health or the environment.

All components and supplies must be free from chemical substances that may be harmful to humans and the environment.

All suppliers must therefore comply with our herewith enclosed **Product Safety and Chemicals Management Policy**. (See Annex 2)

PACKAGING

All packing material shall be chosen with consideration to sustainability. The option with the lowest impact on the environment should always be chosen. Any unnecessary packaging shall be avoided but the protection function for the products shall at all times be upheld.

In addition, any resources and materials used for marketing, communication or POS tools shall be chosen and employed in a responsible and environmentally friendly way. Their impact should be kept as low as possible.

SHIPMENT

Furthermore, it should be ensured that the shipment unit is effectively used and that any resources are used to their highest potential.

PREFERRED ATTRIBUTES

Attached to this document you can find a chart that outlines AKU's preferred impact attributes, which include voluntary certifications and material types that AKU has determined to be most credible, relevant, and impactful in supporting positive impacts across our supply and production chain. (See Annex 4)

For the selection of raw materials and services AKU will prioritize those suppliers featuring these attributes.

5. ETHICAL BUSINESS BEHAVIOUR

WE HIGHLY CARE FOR DATA PROTECTION, ARE VEHEMENTLY OPPOSED TO BRIBERY AND CORRUPTION AND OBJECT TO ANY UNACCEPTABLE BUSINESS PARTNERS.

IN THE SCOPE OF DATA PROTECTION, TECHNICAL DATA, FINANCIAL DATA, OPERATING DATA, CUSTOMER INFORMATION, MEMORANDA OR OTHER INFORMATION REGARDING AKU AND ITS STAKEHOLDERS SHALL NOT BE DISCLOSED.

NO BRIBERY AND CORRUPTION

All concerned parties and business partners act in a straightforward and truthful manner and in accordance with international anti-bribery standards, the United Nations Global Compact, and local anticorruption and bribery laws. This includes any transaction that might appear to be arranged for granting concessions or benefits. We demand that all acceptance or participation in any form of bribery or corruption, including making payments or providing other forms of benefits to governmental agency employees or other governmental employees with the aim of influencing, is refused.

NO UNACCEPTABLE BUSINESS PARTNERS

It is not acceptable to conduct business with companies or organisations whose business practices are built on the exploitation of employees, animals, society, or the environment.

DATA PROTECTION

Information that is not known to the general public shall not be disclosed for personal gain or for the benefit for anyone other than AKU. Such information includes technical data, financial data, operating data, customer information, memoranda or other information regarding the company's business and operational activities and future plans.

6. MONITORING, CONSEQUENCES AND AMENDMENTS

MONITORING

AKU takes responsibility for controlling by reserving the right to monitor compliance with the principles and requirements stated in the Code of Conduct. We expect our suppliers to carry out periodic announced and unannounced inspections and controls of their own business activities and at their subcontractors' facilities. Such inspections shall always be carried out in accordance with applicable laws and regulations.

CONSEQUENCES

AKU verifies that its business is conducted in a compliant manner. For any non-compliant actions of business partners, the consequences of deviations from the Code of Conduct depend on the significance of the breach. Minor breaches usually lead to the opportunity of improvement within a suitable and binding period. If measures of improvement are not implemented within the improvement period, the business relationship will be seriously damaged and could lead to a termination of business relations by us. Significant breaches of the Code of Conduct will not be accepted and lead to the immediate termination of the business relationship.

AMENDMENTS

We reserve the right to amend or modify the Code of Conduct from time to time.

ANNEX 1

ANIMAL WELFARE POLICY

All suppliers subscribing to this policy must follow national and international legislation regarding animal welfare. Breeders and all parties handling the animals should adhere to their Five Freedoms defined by the EU Farm Animal Welfare Council/World Organisation for Animal Health (OIE). The five freedoms are:

- Freedom from hunger and thirst
- Freedom from discomfort
- Freedom from pain, injury and disease
- Freedom to express normal behaviour
- Freedom from fear and distress

Materials must not originate from vulnerable or endangered species.

All parties involved, handling the animals and/or the materials, shall follow national and international legislation regarding forbidden materials. They must also respect and follow international agreements, such as the Convention of International Trade in Endangered Species (CITES). All suppliers are urged to provide as detailed information as possible regarding the origin of the materials. In addition, the following material specific requirements are placed on suppliers:

ANIMAL HAIR & WOOL

Only hair from living and domesticated animals is allowed, including but not limited to sheep, goat, alpaca, lama, camel, cow, buffalo, yak, horse and pig. Hair and wool must not originate from animals that have been handled, harvested or sheared in a cruel or unnecessarily harmful way.

MULESING

Wool must not originate from sheep that have been subject to mulesing or from farms which practice mulesing.

DOWN AND FEATHERS

Down and feathers must originate from slaughtered birds bred for meat production. Down and feathers must not originate from farms practicing live plucking or force feeding.

LEATHER/SKIN

Leather and skin must originate from animals bred for meat production. Leather or skin must not originate from aborted animals, including but not limited to astrakhan, broadtail, krimmer, karakul, Persian lamb, slink or swakara.

Hides must not be sourced from farms involved in any form of deforestation in the Amazon biome.

CAGE BREEDING

Animal hair or fur must not originate from animals reared in cages for their hair, skin, leather or fur, including but not limited to rabbit, mink, raccoon, marten, fox, squirrel, sable, chinchilla or ferret.

FUR

Fur is not allowed. This does not include fleece, sheepskin or leather with its hair attached to the skin, typically used as leather, or synthetic fur.

WILD-CAUGHT ANIMALS

Materials (for example skin, hair or bone) must not originate from wild animals that have been trapped using primitive trapping methods or devices, including but not limited to alligator, beaver, chinchilla, crocodile, fox, lizard, marten, mink, otter, racoon, sable, snake and squirrel.

RABBIT HAIR/ANGORA

Rabbit hair (Angora) is not allowed.

REPTILES

Materials (for example skin, bone, teeth or claws) must not originate from reptiles, including but not limited to alligator, crocodile, lizard and snake.

INDIAN LEATHER

Leather must not originate from Indian cow, calf or ox.

ANIMAL TESTING

Materials or ingredients that have been tested on animals are not allowed, including but not limited to glue and self-adhesives.

ANNEX 2

PRODUCT SAFETY AND CHEMICALS MANAGEMENT POLICY

GENERAL

- General Product Safety Directive (2001/95/EC)

CHEMICALS

- European chemical regulation, REACH Regulation (EC) No 1907/2006, Annex XVII to REACH <https://echa.europa.eu/substances-restricted-under-reach>
- European Regulation on Persistent Organic Pollutants, including SCCP (2019/1021)
- Biocidal Product Regulation (EU) 528/2012
- European Regulation (EU) 412/2012 on DMF
- European Regulation (EU) 2017/1000 on PFOS
- European Regulation (EC) 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP)
- European Regulation (EC) 552/2009, European Regulation (EU) 207/2011& (EU) 757/2010, European 2017/227 on flame retardants
- Personal Protective Equipment (PPE) European Regulation (EU) 2016/425 on Personal Protective Equipment
- The list of substances of very high concern published at: <https://echa.europa.eu>
- **Consumer Product Restricted Substances List** (See Annex 3)

PACKAGING

- European Packaging and Packaging Waste Directive 94/62/EC (as amended)

ANNEX 3

PREFERRED ATTRIBUTES CHARTS

Product Impact Value	Preferred Attribute	Certifications	Description
Fair and safe supply chains	Fair Trade Certification		Promotes safe, healthy working conditions; helps empower communities to build strong, thriving businesses; and supports better trading conditions—including higher wages—for producers and workers.
	Fair Labor Association		Maintains principles for responsible sourcing and responsible production to uphold and protect workers' rights. These fair labor principles are rooted in international labor standards and provide foundational guidance for companies to apply in their systems and operations.
	Business Social Compliance Initiative (BSCI)		Refers to international conventions such as the Universal Declaration of Human Rights, the Children's Rights and Business Principles, UN Guiding Principles for Business and Human Rights, OECD Guidelines, UN Global Compact and ILO Conventions and Recommendations relevant to improve working conditions in the supply chain.
	Ethical Trading Initiative		Works to ensure that all workers are free from exploitation and discrimination, and enjoy conditions of freedom, security, and equity.
Chemicals management	bluesign®		Works to prevent chemicals of concern from entering into textiles-based materials at each step of the manufacturing process while promoting resource conservation and efficiency.
	Leather Working Group certification		Ensures that certified leather suppliers have strong environmental stewardship practices in place and that hides sourced from Brazil are not from farms involved in any form of deforestation in the Amazon biome.
	Oeko-Tex Standard 100		Certifies adherence to the specifications of the standard, a document of testing methods and limit values for potentially harmful chemicals.
Animal welfare	Responsibly sourced down		Certifies that virgin down and feathers came from ducks and geese that were treated well and prohibits certain inhumane practices, including live-plucking and force-feeding.
	Responsible Wool Standard certification		Certifies that virgin wool came from farms with a progressive approach to managing their land and from sheep that have been treated well.
Climate and environmental stewardship	Forest Stewardship Council (FSC) certification		Provides assurance that certified wood products came from forests that were managed responsibly. FSC certification addresses both environmental and social considerations, including deforestation, land use change, Indigenous peoples' rights, and illegal harvesting.
	Organically grown cotton and organic ingredients		Avoids the use of synthetic pesticides, herbicides and fertilizers and ensures that farmers follow best practices to promote water quality, energy conservation, biodiversity and healthy soil.
	Recycled materials		Reduces the need to extract new raw materials, keeps materials out of landfills and typically lessens the amount of resources required to create products.
	Climate Neutral certification		Works to decrease global carbon emissions by getting brands to measure, offset and reduce the carbon they emit.
	Greenhouse Gases – Carbon Footprint of Products		International standard that specifies principles, requirements and guidelines for the quantification and reporting of the carbon footprint of a product (CFP), in a manner consistent with International Standards on life cycle assessment (LCA).
	Environmental Management Standards		International standard that specifies requirements for an effective environmental management system
	Sustainable packaging and how to recycle indications		AKU encourages business partners to use packaging materials that are FSC-certified and/or recycled and that are recyclable or compostable after use. In addition, we encourage the use of recycling indications on product packaging to help understand how to recycle packaging materials after use.

ANNEX 4

CONSUMER PRODUCTS RESTRICTED SUBSTANCES LIST

Please see the following pages.

Substance	Legislation	Requirement	Test Methods	Applicable Materials								
				Leather	Natural textile	Synthetic textile	Plastic ¹	Rubber	Wood	Metallic trim	Mixtures ²	
Azo colourants	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 72⁴ UK REACH⁵ Annex XVII Entry 72⁴ 	< 30mg/kg (see note in Appendix 1)	EN ISO 14362-1:2017 Textiles (natural and synthetic materials) EN ISO 14362-3:2012 Textiles for 4 - aminoazobenzene EN ISO 17234-1:2020 Leather EN ISO 17234-2:2011 Leather for 4 - aminoazobenzene GB/T 19942-2005 - (leather) GB/T 17592-2011 - (textiles)		●	●						
	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 43 UK REACH⁵ Annex XVII Entry 43 Turkish Official Gazette No. 28431 (applies to all materials) 	< 30mg/kg of each amine for dyed products in direct contact with the skin (amines listed in Appendix 1)		●	●	●						
	<ul style="list-style-type: none"> China GB 20400-2006 (leather) China GB 18401-2011 (textiles) 	< 20mg/kg (Chinese requirement for textiles)										
Pentachlorophenol (PCP) and its salts and esters	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 22 UK REACH⁵ Annex XVII Entry 22 	< 1000mg/kg in substances or mixtures	EN ISO 17070:2015 PD CEN/TR 14823:2003 (wood) EN 717-3:1996 (wood) EN ISO 13365-1:2020 (OPP)								●	
	<ul style="list-style-type: none"> Persistent Organic Pollutants Regulation (EU) 2019/1021 	< 1mg/kg (none detected) (see Appendix 8a)										
	<ul style="list-style-type: none"> Spanish specification UNE 59950:2007⁶ 	< 5mg/kg (leather) < 0.05mg/kg (textiles)		●	●			●		●		
	<ul style="list-style-type: none"> German Gefahrstoff Verordnung (Hazardous Substances Ordinance) Annex IV, No 12 	< 5mg/kg										
Tetrachlorophenol (TeCP)	<ul style="list-style-type: none"> No legislation, but commonly quoted in brand and retailer specifications 	< 5mg/kg guidance limit										
Trichlorophenol (TCP)				●	●			●		●		
Orthophenylphenol (OPP)		< 500mg/kg guidance limit										
Nickel	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 27 UK REACH⁵ Annex XVII Entry 27 	< 0.5µg/cm ² /week for products in prolonged contact with the skin < 0.2µg/cm ² /week for ear/body piercing posts	EN 12472:2020 (Accelerated Wear & Corrosion) EN 1811:2011+A1:2015 (Nickel Migration)								●	
Chromium VI	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 47 UK REACH⁵ Annex XVII Entry 47 Germany - 18th Regulation on the amendment of the German ordinance on commodities of 3rd August 2010 	< 3mg/kg (Annex XVII Entry 47 applies to leather coming into contact with the skin)	EN ISO 17075-1:2017 EN ISO 17075-2:2017 (reference method)	●								
	<ul style="list-style-type: none"> Spanish specification UNE 59950:2007⁶ 	< 10mg/kg										
	<ul style="list-style-type: none"> Toy Safety Directive (2009/48/EC) (for children's toys - requirement for all materials)⁸ 	Category I materials < 0.02mg/kg Category II materials < 0.005mg/kg Category III materials < 0.053mg/kg	EN 71-3:2019	●	●	●	●	●	●	●	●	

● Legislative requirement ● Specification or recommended requirement

Substance	Legislation	Requirement	Test Methods	Applicable Materials								
				Leather	Natural textile	Synthetic textile	Plastic ¹	Rubber	Wood	Metallic trim	Mixtures ²	
Phthalates	<ul style="list-style-type: none"> REACH³ Annex XVII Entries 51 and 52 UK REACH⁵ Annex XVII Entries 51 and 52 (see also REACH Candidate List) 	< 0.1% sum of DEHP, DBP, BBP and DIBP < 0.1% sum of DIDP, DINP, DNOP (products intended to be mouthed) See Appendix 2a	EN ISO TS 16181:2011 EN ISO 14389:2014 CPSC-CH-C1001-09.4 (2018)									
	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 72⁴ UK REACH⁵ Annex XVII Entry 72⁴ 	< 0.1% sum of the 5 phthalates listed in Appendix 2b or in other entries of REACH Annex XVII										
	<ul style="list-style-type: none"> 'Children's Safe Products Act' - Washington State Law 	< 0.1% sum of DEHP, DBP, BBP, DIDP, DINP and DNOP					●					
	<ul style="list-style-type: none"> Turkish Official Gazette No. 28431 	< 0.1% sum of DIDP, DINP, DNOP, DEHP, DBP, BBP (applies to all materials)										
	<ul style="list-style-type: none"> RoHS 2 Directive - 2011/65/EU (for products containing electrical components)⁷ 	< 0.1% of DBP, DEHP, BBP and DIBP										
	<ul style="list-style-type: none"> CPSIA section 108 (as updated by 82 FR 49938) 	< 0.1% of the eight phthalates listed in full in Appendix 2c										
Total cadmium		< 100mg/kg in plastic and rubber	EN 1122:2001 EN 17072-2:2019 EN 16711-1:2015				●	●#				
	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 23 UK REACH⁵ Annex XVII Entry 23 	< 100mg/kg in metal parts of jewellery								●*		
		< 1000mg/kg in paint								●*	●*	
	<ul style="list-style-type: none"> California SB 929 - Jewellery for children under 6 	< 300mg/kg									●	
	<ul style="list-style-type: none"> 'Children's safe products' - Washington State Law 	< 40mg/kg										

● Legislative requirement ● Specification or recommended requirement
Synthetic rubber only * Expressed on the weight of the paint on the painted article

Substance	Legislation	Requirement	Test Methods	Applicable Materials									
				Leather	Natural textile	Synthetic textile	Plastic ¹	Rubber	Wood	Metallic trim	Mixtures ²		
Total lead	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 63 UK REACH⁵ Annex XVII Entry 63 	< 0.05% in metal parts of jewellery	SATRA SOP CAT-030 (CPSC-CH-E1001-08.2 for metal items)								●		
		≤ 0.05% in accessible parts that may be placed in the mouth by children	SATRA SOP CAT-030 (CPSC-CH-E1001-08.2 for metal items)										
	'Children's safe products' - Washington State Law	< 90mg/kg	SATRA SOP CAT-029 (CPSC-CH-E1002-08.2 for non-metal items)	●	●	●	●	●	●	●	●	●	
	Illinois - Public Act 097-0612 - Lead Poisoning Act	< 40mg/kg in children's products	SATRA SOP CAT-028 (CPSC-CH-E1003-09.1 for surface coatings)										
	CPSIA 2008 (applies to children's products)	< 100mg/kg in substrates < 90mg/kg in surface coatings											
Arsenic compounds	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 19 UK REACH⁵ Annex XVII Entry 19 	< 1mg/kg (shall not be used in the preservation of wood)	EN 16711-1:2015							●		●	
Polycyclic aromatic hydrocarbons (PAHs)	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 50 UK REACH⁵ Annex XVII Entry 50 Germany - §30 of the German Food and Feed Code (LFGB) 	See Appendix 3a + 3b	PD CEN/TS 16190:2013 EN 17132:2019 (textiles)				●	●					
	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 72⁴ UK REACH⁵ Annex XVII Entry 72⁴ 						●						
Dimethylfumarate (DMFu)	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 61 UK REACH⁵ Annex XVII Entry 61 	< 0.1mg/kg of product or part of product	PD CEN ISO/TS 16186:2012 (leather) EN 17130:2019 (textiles)	●	●	●							
Organostannic compounds (organotins)	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 20 UK REACH⁵ Annex XVII Entry 20 	< 0.1% (restrictions listed in Appendix 4a)	SATRA TM277:2020 PD CEN ISO/TS 16179:2012 EN ISO 22744-1:2020 (textiles) EN ISO 22744-2:2020 (textiles)										
	Japan Law 112	< 1mg/kg (TBT only in textiles) < 0.5mg/kg TBT under 36 months < 1mg/kg other organotins			●	●	●	●	●			●	
	Toy Safety Directive (2009/48/EC) (for children's toys - requirement for all materials) ⁶	See Appendix 4b	EN 71-3:2019										

● Legislative requirement ● Specification or recommended requirement

Substance	Legislation	Requirement	Test Methods	Applicable Materials							
				Leather	Natural textile	Synthetic textile	Plastic ¹	Rubber	Wood	Metallic trim	Mixtures ²
Formaldehyde	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 72⁴ UK REACH⁵ Annex XVII Entry 72⁴ 	< 75mg/kg	EN ISO 17226-1:2019 (leather) EN ISO 14184-1:2011 (textiles) - Free & Hydrolysed formaldehyde EN ISO 14184-2:2011 (textiles) Released formaldehyde		●	●					
	<ul style="list-style-type: none"> Japan Law 112 	< 20mg/kg in children's wear under 36 months < 75mg/kg in children's wear over 36 months		●	●	●					
	<ul style="list-style-type: none"> Spanish specification UNE 59950:2007⁶ 	< 150mg/kg in leather < 75mg/kg in textiles									
	<ul style="list-style-type: none"> China GB 20400-2006 (leather only) 	< 20mg/kg in children's wear under 36 months < 75mg/kg in textiles in skin contact < 300mg/kg in natural and synthetic leather		●	●	●		●			
	<ul style="list-style-type: none"> SATRA recommended guideline limits 	< 75mg/kg in leather < 16mg/kg in children's textiles < 20mg/kg in children's leather									
Extractable metals	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 72⁴ UK REACH⁵ Annex XVII Entry 72⁴ 	< 1mg/kg of cadmium, chromium VI, arsenic and lead compounds listed in REACH Annex XVII entries 28, 29 and 30	EN 16711-2:2015 (Cd, Pb, As, total Cr) EN ISO 17075-2:2017 (Cr VI)		●	●					
	<ul style="list-style-type: none"> Toy Safety Directive (2009/48/EC) for accessible materials for children under six years⁸ China GB21550-2008 Taiwan CNS15503 (children's product) 	See Appendix 5	EN 71-3:2019 GB 21550 clause 5.4 CNS 4747-2	●	●	●	●	●	●	●	
Extractable chromium	<ul style="list-style-type: none"> General Product Safety⁹ 	< 250mg/kg	BS 6684:1989 Appendix A SATRA TM358:1999	●							
Disperse dyes	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 72⁴ UK REACH⁵ Annex XVII Entry 72⁴ 	< 50mg/kg of Disperse Blue 1, Basic Red 9 and Basic Violet 3	DIN 54231 ISO 16373 Parts 1, 2 and 3:2014 SATRA TM459:2020			●					
	<ul style="list-style-type: none"> Germany - §30 of the German Food and Feed Code (LFGB) Retailer Specifications 	< 75mg/kg (dyes listed in Appendix 6)				●					

● Legislative requirement ● Specification or recommended requirement

Substance	Legislation	Requirement	Test Methods	Applicable Materials								
				Leather	Natural textile	Synthetic textile	Plastic ¹	Rubber	Wood	Metallic trim	Mixtures ²	
PFOS (perfluorooctanyl sulphonates) and its derivatives	<ul style="list-style-type: none"> Persistent Organic Pollutants Regulation (EU) 2019/1021 (as amended by (EU) 2020/784) 	Testing relevant when water/stain resistant treatment has been applied < 1µg/m ² for textiles and coated materials < 0.1% by mass for other materials < 10mg/kg in substances or mixtures (see Appendix 8b)	PD CEN/TS 15968:2010 EN ISO 23702-1:2018									
PFOA (perfluorooctanoic acid) and its salts	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 68 UK REACH⁵ Annex XVII Entry 68 	< 25µg/kg in substances, mixtures or articles (see Appendix 8b)			●	●	●					
	<ul style="list-style-type: none"> Persistent Organic Pollutants Regulation (EU) 2019/1021 (as amended by (EU) 2020/784) 											
Nonyl phenol (NP) and nonyl phenol ethoxylates (NPE)	<ul style="list-style-type: none"> REACH³ Annex XVII entries 46 and 46a (as amended by Regulation (EU) No 2016/26¹⁰) UK REACH⁵ Annex XVII entries 46 and 46a¹⁰ 	< 1000mg/kg in mixtures < 100mg/kg guidance limit for articles < 100mg/kg for NPE only ¹⁰	SATRA SOP CAT-020 EN ISO 18218-1:2015 (leather) EN ISO 18218-2:2019 (leather) EN ISO 18254-1:2016 (textiles)	●	●	●						●
Octyl phenol (OP) and octyl phenol ethoxylates (OPE)	<ul style="list-style-type: none"> No current EU-wide legislation - SATRA recommended guideline limit 	< 1000mg/kg in mixtures < 100mg/kg for articles			●	●	●					
C₁₀ to C₁₃ Chloroalkanes, SCCP (short chained chlorinated paraffins)	<ul style="list-style-type: none"> Persistent Organic Pollutants Regulation (EU) 2019/1021 (see also REACH candidate list) 	< 1% in substances or mixtures < 0.15% in articles (see Appendix 8b)	EN ISO 18219:2015 EN 12766-1:2000	●		●	●	●				●
Heavy metals (Pb, Cd, Hg & Cr VI)	<ul style="list-style-type: none"> European Packaging Directive 2004/12/EC 	< 100mg/kg sum of Pb, Cd, Hg and Cr VI	EN 1122:2001 (modified) EN 16711-1:2015				●					
	<ul style="list-style-type: none"> RoHS 2 Directive 2011/65/EU (for products containing electrical components)⁷ 	Hg < 1000mg/kg Cr VI < 1000mg/kg Cd < 100mg/kg Pb < 1000mg/kg		●	●	●	●	●	●	●		

● Legislative requirement ● Specification or recommended requirement

Substance	Legislation	Requirement	Test Methods	Applicable Materials							
				Leather	Natural textile	Synthetic textile	Plastic ¹	Rubber	Wood	Metallic trim	Mixtures ²
Brominated flame retardants	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 67 UK REACH⁵ Annex XVII Entry 67 	< 1000mg/kg of Decabromodiphenyl ether (Deca BDE)	EN ISO 17881-1:2016	●	●	●	●	●	●		
	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 45 UK REACH⁵ Annex XVII Entry 45 	< 1000mg/kg of Octabromodiphenyl ether (Octa BDE)									
	<ul style="list-style-type: none"> Persistent Organic Pollutants Regulation (EU) 2019/1021 	< 500mg/kg sum of Tetrabromodiphenyl ether (Tetra BDE), Pentabromodiphenyl ether (Penta BDE), Hexabromodiphenyl ether (Hexa BDE), Heptabromodiphenyl ether (Hepta BDE) and Decabromodiphenyl ether (Deca BDE) (see Appendix 8b)		●	●	●	●				
	<ul style="list-style-type: none"> RoHS 2 Directive - 2011/65/EU (for products containing electrical components)⁷ 	< 1000mg/kg of Polybrominated biphenyls (PBB) and Polybrominated diphenyl ethers (PBDE) (see Appendix 7)		●	●	●	●	●	●	●	
1-methyl-2-pyrrolidone (NMP)	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 71 UK REACH⁵ Annex XVII Entry 71 (see also REACH candidate list) 	< 0.3% in mixtures	EN ISO 19070:2016	●							●
	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 72⁴ UK REACH⁵ Annex XVII Entry 72⁴ (see also REACH candidate list) 	< 3000mg/kg			●	●					
Polybrominated biphenyls	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 8 UK REACH⁵ Annex XVII Entry 8 	Shall not be used in textile articles intended to come into contact with the skin	GC-ECD or GC-MS EN ISO 17881-1:2016		●	●					
Tris (2,3 dibromopropyl) phosphate (Flame retardant)	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 4 UK REACH⁵ Annex XVII Entry 4 	Shall not be used in textile articles intended to come into contact with the skin	EN ISO 17881-2:2016		●	●					
Dimethylformamide (DMFa)	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 72⁴ UK REACH⁵ Annex XVII Entry 72⁴ 	< 3000mg/kg	PD CEN ISO/TS 16189:2013 EN 16778:2016 (method for gloves)		●	●	●				
	<ul style="list-style-type: none"> SATRA recommended guideline limit for PU materials (see also REACH candidate list) 	< 1000mg/kg						●			
Dimethylacetamide (DMAC)	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 72⁴ UK REACH⁵ Annex XVII Entry 72⁴ 	< 3000mg/kg	PD CEN ISO/TS 16189:2013 (modified)		●	●	●				
Nitrosamines	<ul style="list-style-type: none"> EU Directive 93/11/EEC (teething rings) also Eco-label requirement EU Toy Directive 2009/48/EC 	< 0.1mg/kg	EN 12868:2017 EN 71-12:2016					●			

● Legislative requirement ● Specification or recommended requirement

Substance	Legislation	Requirement	Test Methods	Applicable Materials										
				Leather	Natural textile	Synthetic textile	Plastic ¹	Rubber	Wood	Metallic trim	Mixtures ²			
Benzene	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 5 UK REACH⁵ Annex XVII Entry 5 	< 1mg/kg in mixtures	GC-MS Headspace										●	
		< 5mg/kg in toys					●							
	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 72⁴ UK REACH⁵ Annex XVII Entry 72⁴ 	< 5mg/kg			●	●	●							
Toluene	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 48 UK REACH⁵ Annex XVII Entry 48 	< 0.1% in adhesives and spray paints on sale to the general public	GC-MS Headspace											●
Cyclohexane	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 57 UK REACH⁵ Annex XVII Entry 57 	< 1mg/kg in neoprene based adhesives for sale to the general public	GC-MS Headspace											●
Residual Volatile Organic Compounds: Toluene, Naphthalene, Benzene, Anthracene, Xylene	<ul style="list-style-type: none"> VOC compounds which may be associated with odour or health effects. SATRA recommended guideline limits 	Toluene < 50mg/kg (from EH40 WEL) Naphthalene < 5mg/kg (OSHA requirements < 10mg/kg) Benzene < 1mg/kg (from EH40 WEL) Anthracene < 1mg/kg (OSHA requirements) Xylene < 50mg/kg (from EH40 WEL)	GC-MS Headspace	●	●	●	●	●	●	●	●	●	●	●
Asbestos	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 6 UK REACH⁵ Annex XVII Entry 6 	Use prohibited	MDHS 39/4			●	●							
pH value	<ul style="list-style-type: none"> Requirement for PPE Regulation (EU) 2016/425¹¹ 	3.5 < pH < 9.5 (textiles) > 3.2 (leather) Korea: 4 < pH < 9 (textiles)	EN ISO 4045:2018 (leather) EN ISO 3071:2020 (textiles/other materials)	●	●	●	●							
Chlorotoluenes	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 72⁴ UK REACH⁵ Annex XVII Entry 72⁴ 	< 1mg/kg of p-chlorobenzotrichloride, benzotrichloride or benzyl chloride	EN 17137:2018		●	●	●							
Quinoline	<ul style="list-style-type: none"> REACH³ Annex XVII Entry 72⁴ UK REACH⁵ Annex XVII Entry 72⁴ 	< 50mg/kg	Solvent extraction followed by LC-MS/MS or LC-DAD detection		●	●								
Natural rubber latex	<ul style="list-style-type: none"> HSE Guidance for gloves 	< 50µg/g to be described as low allergenicity	EN 455-3:2015 Appendix A					●						
Pesticides	<ul style="list-style-type: none"> Persistent Organic Pollutants Regulation (EU) 2019/1021 	See Appendix 8a	ISO 22517:2019	●	●									

● Legislative requirement ● Specification or recommended requirement

Notes

1. Plastics includes coated textiles and coated leathers. The leather or synthetic textile column identifies the applicable substances for the substrates.
2. Mixtures are a combination of substances that can be used during manufacturing (for example adhesives or cleaning solutions) and finishing treatments (for example stain or water repellent treatments or polishes).
3. REACH – Regulation (EC) No 1907/2006.
4. REACH and UK REACH Annex XVII Entry 72 applies to footwear, clothing and textiles which come into contact with human skin to an extent similar to clothing.
5. UK REACH Statutory Instruments 2020 No. 1577 Exiting the European Union Consumer Protection Environmental Protection Health and Safety. The REACH etc. (Amendment etc.) (EU Exit) Regulations 2020.
6. Although the Spanish national standard UNE 59950:2007 was withdrawn in 2013, Spanish customs may reject products that do not conform to these requirements.
7. The RoHS 2 directive for items which contain electronic components has requirements for Phthalates, Pb, Cd, Hg, Cr VI and PBDE/PBB. RoHS 2 applies to all materials in a product classified as EEE (Electrical or Electronic Equipment).
8. Applicable to products intended for children under 6 years where there is a risk of chewing or sucking.
9. Chrome-tanned leather may not meet the Chromium III requirement for category III materials specified within EN 71-3:2019 although leathers can be manufactured to meet this migration limit. Where appropriate an alternative due diligence guideline for leathers refers to the baby harness standard BS 6684 Appendix A or SATRA TM 358.
10. Commission regulation (EU) 2016/26 limits the concentration of NPE in textiles which can reasonably be expected to be washed in water during their normal lifecycle to a maximum of 0.01% since 3 February 2021.
11. Within the EU, the requirement for pH is mandatory for PPE (personal protective equipment) only.

This Consumer Products Restricted Substances List (RSL) considers only substances that are restricted by legislation and substances which are commonly found in textile, leather or polymeric materials which have been linked to health or environmental concerns. It does not include all the SVHC substances, Washington State Children Safe Product Act (CSPA) Chemicals of High Concern to Children (CHCC) or California Proposition 65.

The full list of substances restricted under REACH can be found at <https://echa.europa.eu/substances-restricted-under-reach> (updated on 22 February 2021).

Appendix

Appendix 1 – Restricted aromatic amines in REACH Regulation (EC) No 1907/2006 Entries 43 and 72

Amine	CAS number
4-amino bi phenyl	92-67-1
Benzidine	92-87-5
4-chloro-o-toluidine	95-69-2
2-naphthylamine	91-59-8
o-aminoazotoluene	97-56-3
5-nitro-o-toluidine	99-55-8
4-chloroaniline	106-47-8
4-methoxy-m-phenylenediamine	615-05-4
4,4'-methylenedianiline	101-77-9
3,3'-dichlorobenzidine	91-94-1
3,3'-dimethoxybenzidine	119-90-4
3,3'-dimethylbenzidine	119-93-7
4,4'-methylenedi-o-toluidine	838-88-0
6-methoxy-m-toluidine	120-71-8
2-chloroaniline	101-14-4
4,4'-oxydianiline	101-80-4
4,4'-thiodianiline	139-65-1
o-toluidine	95-53-4
4-methyl-m-phenylenediamine	95-80-7
2,4,5-trimethylaniline	137-17-7
o-anisidine	90-04-0
4-aminoazobenzene	60-09-3
2,4-xylidine*	95-68-1
2,6-xylidine*	87-62-7

* China GB 20400-2006 and ISO 17234-1:2015 only

Note: The aromatic amines listed above in purple may be formed from the 4 amine salts restricted in REACH Annex XVII Entry 72, hence testing for the presence of azo colourants will confirm if these salts are present

Appendix 2a – Restricted phthalates in REACH Regulation (EC) No 1907/2006 Annex XVII Entries 51 and 52

Phthalate	Abbreviation	CAS number	Restrictions
Bis (2-ethylhexyl) phthalate	DEHP	117-81-7	No greater than 0.1% (individually or in any combination of the phthalates) by mass of plasticised material in articles
Dibutyl phthalate	DBP	84-74-2	
Benzyl butyl phthalate	BBP	85-68-7	
Di-isobutyl phthalate	DIBP	84-69-5	
Di-isononyl phthalate	DINP	28553-12-0 68515-48-0	No greater than 0.1% (individually or in any combination of the phthalates) by mass of plasticised material in toys and childcare articles which can be placed in the mouth
Di-isodecyl phthalate	DIDP	26761-40-0 68515-49-1	
Di-n-octyl phthalate	DNOP	117-84-0	

Appendix 2b – Restricted phthalates in REACH Regulation (EC) No 1907/2006 Annex XVII Entry 72

Phthalate	Abbreviation	CAS number	Restrictions
1,2-benzenedicarboxylic acid; diC 6-8-branched alkylesters, C 7- rich	DIHP	71888-89-6	< 0.1% (individually or in combination with other phthalates in this entry or in other entries of Annex XVII that are classified in Part 3 of Annex VI to Regulation (EC) No 1272/2008 in any of the hazard classes carcinogenicity, germ cell mutagenicity or reproductive toxicity, category 1A or 1B
Bis(2-methoxyethyl) phthalate	-	117-82-8	
Diisopentylphthalate	DIPP	605-50-5	
Di-n-pentyl phthalate	DnPP	131-18-0	
Di-n-hexyl phthalate	DnHP	84-75-3	

Appendix

Appendix 2c – Restricted phthalates in Consumer Products Safety Improvement Act (CPSIA) 2008, section 108 as amended by 82 FR 49938

Phthalate	Abbreviation	CAS Number	Restriction
Bis (2-ethylhexy) phthalate	DEHP	117-81-7	Prohibited in children's toys and child care articles at concentrations above 0.1%
Dibutyl phthalate	DBP	84-74-2	
Benzyl butyl phthalate	BBP	85-68-7	
Di-isononyl phthalate	DINP	28553-12-0 68515-48-0	
Di-n-pentyl phthalate	DnPP	131-18-0	
Di-n-hexyl phthalate	DnHP	84-75-3	
Dicyclohexyl phthalate	DCHP	84-61-7	
Diisobutyl phthalate	DIBP	84-69-5	

Appendix 3a – REACH Regulation (EC) No 1907/2006 Annex XVII Entries 50 and 72

Polycyclic aromatic hydrocarbon (PAH)	CAS number	Restriction in toys* (mg/kg)	Restriction in articles* (mg/kg)
Benzo[a]pyrene	50-32-8	< 0.5	< 1
Benzo[e]pyrene	192-97-2	< 0.5	< 1
Benzo[a]anthracene	56-55-3	< 0.5	< 1
Chrysene	218-01-9	< 0.5	< 1
Benzo[b]fluoranthene (Benz[e]acephenanthrylene)	205-99-2	< 0.5	< 1
Benzo[j]fluoranthene	205-82-3	< 0.5	< 1
Benzo[k]fluoranthene	207-08-9	< 0.5	< 1
Dibenzo[a,h]anthracene	53-70-3	< 0.5	< 1

*The restrictions apply to the rubber and plastic components of both toys and articles which come into contact with the human skin or oral cavity.

Appendix 3b - Polycyclic aromatic hydrocarbons (German GS Mark)

Substance	Category 1 (mg/kg)	Category 2 (mg/kg)		Category 3 (mg/kg)	
		Toys	Other products according to ProdSG	Toys	Other products according to ProdSG
Benzo[a]pyrene	< 0.2	< 0.2	< 0.5	< 0.5	< 1
Benzo[e]pyrene					
Benzo[a]anthracene					
Benzo[b]fluoranthene					
Benzo[j]fluoranthene					
Benzo[k]fluoranthene					
Chrysene					
Dibenz[a,h]anthracene					
Benzo[g,h,i]perylene					
Ideno[1,2,3-cd]pyrene					
Anthracene	< 1 (sum)	< 5 (sum)	< 10 (sum)	< 20 (sum)	< 50 (sum)
Fluoranthene					
Phenanthrene					
Pyrene					
Naphthalene	< 1	< 2	< 10		
Sum of 15 PAHs	< 1	< 5	< 10	< 20	< 50

Category 1: Material in contact with foodstuff, or materials intended to be put in mouth and toys for children aged under 36 months intended to come into contact with the skin.

Category 2: Materials not covered by Category 1 with foreseeable contact to skin for longer than 30 seconds (long term skin contact).

Category 3: Materials with foreseeable contact to skin for up to 30 seconds (short term skin contact).

Appendix

Appendix 4a - Restricted organotin compounds and specific requirements for DOT

Organotin	Abbreviation
Tributyltin	TBT
Triphenyltin	TPhT
Dibutyltin	DBT
Diocetyl tin	DOT

Diocetyl tin (DOT) compounds shall not be present above 0.1% by weight of tin in the following articles:

- Textile articles intended to come into contact with the skin
- Gloves
- Footwear or parts of footwear intended to come into contact with the skin
- Childcare articles
- Wall and floor coverings
- Female hygiene products
- Nappies
- Two-component room temperature vulcanisation moulding kits.

Appendix 4b – EN 71-3:2019 Organic tin migration limits from toy materials

Organic tin cation	Migration Limit (mg/kg)		
	Category I	Category II	Category III
Methyl tin (MeT)	0.9 (total)	0.2 (total)	12 (total)
Dimethyl tin (DMT)			
Butyl tin (BuT)			
Di-n-propyl tin (DProT)			
Dibutyl tin (DBT)			
Tributyl tin (TBT)			
n-Octyl tin (MOT)			
Tetrabutyl tin (TeBT)			
Diphenyl tin (DPhT)			
Di-n-octyl tin (DOT)			
Triphenyl tin (TPhT)			

Appendix 5 – EN 71-3:2019 Migration of certain elements - migration limits

Element	mg/kg in dry, brittle, powder-like, pliable material category I	mg/kg in liquid or sticky toy material category II	mg/kg in scraped off toy material category III
Aluminium	2,250*	560*	28,130*
Antimony	45	11.3	560
Arsenic	3.8	0.9	47
Barium	1,500	375	18,750
Boron	1,200	300	15,000
Cadmium	1.3	0.3	17
Chromium (III)	37.5	9.4	460
Chromium (VI)	0.02	0.005	0.053
Cobalt	10.5	2.6	130
Copper	622.5	156	7,700
Lead	2.0	0.5	23
Manganese	1,200	300	15,000
Mercury	7.5	1.9	94
Nickel	75	18.8	930
Selenium	37.5	9.4	460
Strontium	4,500	1,125	56,000
Tin	15,000	3,750	180,000
Organic Tin	0.9	0.2	12
Zinc	3,750	938	46,000

The materials used in consumer products will predominantly be classified as category III materials

*The reduced migration limits for Aluminium apply from 20 May 2021 (Commission Directive (EU) 2019/1922)

Appendix

Appendix 6 – Allergenic and carcinogenic disperse dyes

Allergenic disperse dyes Disperse blue 3 Disperse blue 7 Disperse blue 26 Disperse blue 35 Disperse blue 102 Disperse blue 106 Disperse blue 124 Disperse brown 1 Disperse orange 1 Disperse orange 3 Disperse orange 37/59/76 Disperse red 1 Disperse red 11 Disperse red 17 Disperse yellow 1 Disperse yellow 9 Disperse yellow 39 Disperse yellow 49	Allergenic and carcinogenic dyes Disperse yellow 3 Carcinogenic dyes Acid red 26 Basic red 9* Basic violet 3* Basic violet 14 Direct black 38 Direct blue 6 Direct red 28 Disperse blue 1* Disperse orange 11 Further forbidden dyes Disperse orange 149 Disperse yellow 23
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*Disperse dyes restricted to < 50mg/kg under REACH - Regulation (EC) No 1907/2006 Annex XVII Entry 72 (applies from 1 November 2020)

Appendix 7 – Restricted brominated flame retardants in REACH and/or RoHS 2

Flame retardant substances	
Monobromobiphenyls Dibromobiphenyls Tribromobiphenyls Tetrabromobiphenyls Pentabromobiphenyls Hexabromobiphenyls Heptabromobiphenyls Octabromobiphenyls Nonabromobiphenyls Decabromobiphenyls	Monobromobiphenyl ethers Dibromobiphenyl ethers Tribromobiphenyl ethers Tetrabromobiphenyl ethers Pentabromobiphenyl ethers Hexabromobiphenyl ethers Heptabromobiphenyl ethers Octabromobiphenyl ethers Nonabromobiphenyl ethers Decabromobiphenyl ethers

Appendix 8a – Persistent Organic Pollutants Regulation (EU) 2019/1021 – restrictions for Pesticides

Substance	CAS Number	Maximum allowable concentration in Articles
Aldrin	309-00-2	None detected
Chlordane	57-74-9	
Dichloro-diphenyl-trichloroethane (DDT)	50-29-3	
Dieldrin	60-57-1	
Endrin	72-20-8	
Heptachlor	76-44-8	
Hexachlorobenzene	118-74-1	
Mirex	2385-85-5	
Toxaphene	8001-35-2	
Hexachlorocyclohexane (including lindane)	58-89-9, 319-84-6, 319-85-7 and 608-73-1	
Chlordecone	143-50-0	
Pentachlorobenzene	608-93-5	
Pentachlorophenol	87-86-5	
Endosulfan	115-29-7, 959-98-8, 33213-65-9	

Appendix

Appendix 8b – Persistent Organic Pollutants Regulation (EU) 2019/1021 as amended by (EU) 2020/784 – restrictions for industrial chemicals

Substance	CAS Number	Maximum allowable concentration in Articles
Hexachlorobenzene	118-74-1	None detected
Polychlorinated biphenyls (PCBs)	1336-36-3 and others	< 0.005% (50mg/kg)
Hexabromobiphenyl	36355-01-8	None detected
Hexabromocyclododecane	25637-99-4, 3194-55-6, 134237-50-6, 134237-51-7, 134237-52-8	< 0.01% (100mg/kg)
Bromodiphenyl ethers (Tetra-, Penta-, Hexa-, Hepta- and Deca-)	40088-47-9, 32534-81-9, 36483-60-0, 68928-80-3 and 1163-19-5	< 0.05% sum of (500mg/kg)
Hexachlorobutadiene	87-68-3	None detected
Pentachlorobenzene	608-93-5	None detected
Perfluorooctane sulfonic acid (PFOS) and its derivatives	1763-23-1, 2795-39-3, 29457-72-5, 29081-56-9, 70225-14-8, 56773-42-3, 251099-16-8, 4151-50-2, 31506-32-8, 1691-99-2, 24448-09-7, 307-35-7 and others	< 0.1% (1000mg/kg)
Polychlorinated naphthalenes	70776-03-3 and others	None detected
Short-chained chlorinated paraffins (SCCPs)	85535-84-8 and others	< 0.15% (1500 mg/kg)
Perfluorooctanoic acid (PFOA)	335-67-1	< 0.0000025% (25µg/kg)
Perfluorooctanoic acid related compounds	-	< 0.0001% (1mg/kg)