

## Regulatory Information for CLIMAFLEX® articles produced by NMC

### Note

This version supersedes and replaces 'RI-006 ISO CLIMAFLEX® - EN'.

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 table attached in Annex I provides an overview of which product ranges contain one of the substances listed on the Candidate List in concentrations above 0.1% by weight.

**ADCA (Azodicarbonamide)** was added to the candidate list of Substances of Very High Concern for its possible respiratory sensitizing properties.

ADCA is a frequently used chemical blowing agent, which decomposes during heat induced foaming processes commonly used to produce rubber foams. Residual ADCA levels in those foams are typically very low, but not nil. In our production processes we take special care to ensure residual ADCA levels as low as technically feasible. However, the product references listed in Annex I, have, despite our continuous efforts, residual ADCA levels slightly above the 0.1 wt% threshold ( $\leq 0.5$  wt%) for which a mandatory registration is required in the ECHA SCIP database. In Annex I, you will, in compliance with REACH Regulation, find their resp. SCIP notification information.

We will continue our efforts in further reducing the residual ADCA levels and are closely monitoring the situation. We will, in due time, inform customers if we've been successful for the concerned references in Annex I.

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 technical insulation segment require flame retardants for their intended use, which is why DBDPE is present in certain products (see annex I for more details about concerned product ranges).

NMC has fulfilled its SCIP notification obligations within the required deadlines. The SCIP registration number is provided in Annex I. 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 of this letter we do not intentionally add substances listed in the following European Regulations / Directives:

- 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))
- (EU) 2025/40 on packaging and packaging waste regulation
  - 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 products listed in Annex I of this letter we do not intentionally add substances listed in the following European Regulations / Directives:

- o Per- and polyfluoroalkyl substances (PFAS) including Perfluorooctanoic acids (PFOA) and Perfluorooctanesulfonic acids (PFOS)

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.



*Foams that fit*

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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, September 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.

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## Annexe I : Concerned product ranges

| Product range                  | SCIP reference number                | ADCA | DBDPE* |
|--------------------------------|--------------------------------------|------|--------|
| CLIMAFLEX® naturefoam          | b1687c5e-295c-480f-a766-0bbe110e6d2b | No   | Yes*   |
| CLIMAFLEX® naturefoam easy     | a0491b4a-21e8-42fc-baee-ea50431ffd60 | No   | Yes*   |
| CLIMAFLEX® naturefoam stabil   | 0f043b00-de59-402e-8990-7ecfce099438 | No   | Yes*   |
| CLIMAFLEX® naturefoam exzentro | 6c770aa0-9490-46d2-b664-ad0fd06cb65c | No   | Yes*   |
| CLIMAFLEX® premium             | 19570404-ca5a-4dad-8350-64f17051371d | No   | Yes*   |
| CLIMAFLEX® premium stabil      | 4cfa054a-44ee-4f25-9e29-c8a9f55c413e | No   | Yes*   |
| CLIMAFLEX® basic               | 59e36018-42cd-47da-a8a6-da83376d9f8e | No   | Yes*   |
| CLIMAFLEX® roll 10 mm          | 2ad1c75e-af8a-4f18-9aed-e19e91e9e1e0 | Yes  | Yes*   |
| CLIMAFLEX® roll 15 mm          | 0a6e20e4-cfd5-497f-9dff-2b7df6173b47 | Yes  | Yes*   |
| CLIMAFLEX® roll 20 mm          | d2925b56-cc3f-49c9-a478-cc0868c6d2c8 | Yes  | Yes*   |
| CLIMAFLEX® PE Insulation Tape  | 333df437-9305-4b75-88c4-87ad455944d7 | No   | Yes*   |
| CLIMAFLEX® basic stabil        |                                      | No   | No     |
| CLIMAFLEX® UK                  |                                      | No   | No     |
| CLIMAFLEX® SPIRAL              |                                      | No   | No     |
| CLIMAFLEX® hf                  |                                      | No   | No     |
| CLIMAFLEX® hf easy             |                                      | No   | No     |
| CLIMAFLEX® hf stabil           |                                      | No   | No     |
| CLIMAFLEX® hf exzentro         |                                      | No   | No     |

## Annex II: Excluded products

The following product ranges are excluded from the statements listed above: None