

Regulatory Information for articles CLIMATUBE® produced by nmc

Note

This version supersedes and replaces version “RI-012 ISO - 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% w/w.

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 (≤ 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.

MCCP (Medium-Chain Chlorinated paraffins) were added to the candidate list of Substances of Very High Concern for its possible persistent, bio-accumulative and toxic properties.

MCCP is commonly used as a plasticizer & flame retardant in rubber foam products. Although we are looking for alternatives, we confirm that the product references listed in Annex I contain MCCP levels exceeding the

0.1 wt% threshold 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 replacing MCCP in our formulations 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.

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.

Recommended protective measures

Due to the physical encapsulation of the ADCA traces in our foam products and the nature of the risks identified by ECHA, no special care needs to be taken with respect to these residual ADAC levels in product references listed in Annex I.

However, as for most plasticizers it cannot be excluded that MCCP migrates. Due to the nature of the risks identified by ECHA, it is recommended to wear protective gloves when handling & installing foams containing MCCP and to ensure sufficient ventilation.

In the state of our current knowledge, these risks relate to environmental persistence and bioaccumulation rather than immediate hazards. Under normal conditions of use, our foam products do not release dust, are not inhaled, and are not ingested. The substance is physically embedded within the material, which minimizes any potential exposure. Therefore, no additional precautions are required beyond standard good practices for storage, handling, and installation.

You may address all your ADCA, MCCP, DBDPE related questions to your commercial contact.

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:

- 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))

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:

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

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.



Florent Pouzet
CEO

Eynatten, June 2026

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 range	SCIP reference number	MCCP	ADCA	DBDPE*
CLIMATUBE® easy	fe7ee581-0ceb-47a1-96ad-7a12bddbdd78	No	No	Yes*
CLIMATUBE® easy bow	25e8aed3-7427-4e8e-a47f-0288b849b2ae	No	No	Yes*
CLIMATUBE® easy T	1eb59d60-db91-462d-b774-fd70e4143868	No	No	Yes*
CLIMATUBE® zip	0e5c8b02-72fd-4fd5-bf41-7ccc28913fcf	No	No	Yes*
CLIMATUBE® zip bow	d85d647a-e522-43bd-9fc0-5b27dd8ad7d4	No	No	Yes*
CLIMATUBE® basic		No	No	No
CLIMATUBE® protect		No	No	No
CLIMATUBE® flex	c8eedfc5-8624-423b-8fe1-72bc19b8f212	Yes	Yes	Yes*
CLIMATUBE® flex L	62fc074c-247e-4957-aeff-327f18cf604b	Yes	Yes	Yes*
CLIMATUBE® flex XT	983a68b1-0c18-4f4f-ba03-1875e57fed71	Yes	Yes	Yes*

Please contact our customer service for further information.