Rotterdam Olefins Polyolefins B.V.
Aert van Nesstraat 45,
3012 CA Rotterdam, The Netherlands

Product Regulatory Summary: AdvyForm E1180

Internal referenc **1Q121, BEN6349** **Version 2 ; October 8, 2026**

European Union Food Contact

This product is not compliant with Commission Regulation (EU) No. 10/2011 on plastic materials and articles intended to come into contact with food (PIM).

United States Food contact

This resin does not comply with the applicable requirements of the U.S. Food and Drug Administration (FDA) regulations for materials intended for use in food-contact and food packaging applications. Accordingly, this resin is not suitable for use in articles intended to contact food.

Allergen - Food Allergen European Regulation 1169/2011

The food ingredients and substances listed in Annex II of Regulation (EU) No. 1169/2011 on the provision of food information to consumers are not intentionally used in the manufacture or formulation of this product.

However, this product has not been specifically tested for the presence of these substances, and no claim regarding their absence can be made based on analytical testing.

Conflict Minerals and Extended Minerals (Responsible Minerals Initiative)

To the best of our knowledge and based on current product information, material specifications, supplier declarations, and due diligence processes, this product is not intentionally formulated with minerals or metals that fall within the reporting scope of the Responsible Minerals Initiative (RMI) reporting templates listed below:

Conflict Minerals Reporting Template (CMRT) Version 6.6, covering tin (Sn), tantalum (Ta), tungsten (W), and gold (Au) (3TG);
Extended Minerals Reporting Template (EMRT) Version 2.11, covering cobalt and mica; and
Additional Minerals Reporting Template (AMRT) Version 1.35, covering silver, zinc, aluminum, and iron.

Accordingly, Velogy is not required to report smelter or refiner information for these minerals under the above-mentioned RMI reporting templates.

An exception applies to aluminum, which may be present at trace levels as a result of the use of Ziegler-Natta catalyst systems during polymer manufacturing. Residual aluminum concentrations are typically in the range of approximately 5–50 ppm and are not intentionally added as a constituent of the product.This statement is based on available supplier information and due diligence processes and does not constitute analytical verification of the absence of the referenced minerals or metals.

Packaging and Packaging Waste (PPWR)

Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC, establishes specific requirements for substances present in packaging materials and packaging components.
Based on available raw material data, supplier information, and manufacturing process knowledge, the following can be declared for this product:
-The sum concentration of cadmium (Cd), hexavalent chromium (Cr(VI)), mercury (Hg), and lead (Pb) does not exceed 100 ppm.
-Per- and polyfluoroalkyl substances (PFAS) are not intentionally used in the manufacture or formulation of this product.

This statement is based on raw material composition data, supplier declarations, and production process knowledge. The product has not been specifically tested for heavy metals or PFAS, and no analytical verification is provided.

Toxics in Packaging Legislation (US CONEG)

Based on the available information and documentation provided by our raw material suppliers, this product complies with the requirements of the Model Toxics in Packaging Legislation (formerly known as CONEG legislation) Legislation concerning the sum concentration limit for the heavy metals lead (Pb), mercury (Hg), cadmium (Cd), and hexavalent chromium (Cr(VI)).

Accordingly, the combined concentration of these regulated heavy metals does not exceed the maximum limit specified by the Model Legislation, based on supplier-provided data.

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IMDS (International Material Data System)

Velogy companies maintain product data in the International Material Data System (IMDS) to support automotive industry recycling initiatives, facilitate compliance assessments with the heavy metals requirements of the European Union End-of-Life Vehicles (ELV) Directive, and declare the presence of substances included in the Global Automotive Declarable Substance List (GADSL), where applicable.

Material Data Sheets (MDSs) for Velogy products are published directly in IMDS and are accessible to all IMDS users through the IMDS platform. Velogy does not submit MDS reports to individual customer recipient IDs.

For reference, the IMDS ID number for this product is: 1510329353

It is the sole responsibility of the customer to evaluate, verify, and validate the suitability of the supplied product for its intended automotive application and for compliance with all applicable legal, regulatory, industry-specific, and customer-specific requirements.

The customer is responsible for ensuring the proper, safe, and legally compliant use, processing, handling, storage, and disposal of the supplied product.

All information provided, including IMDS data, is supplied in good faith and based on the information available at the time of issuance. However, such information does not relieve the customer of its obligation to conduct its own assessments, testing, verification, and validation activities to determine the suitability of the product for the intended application.

Restriction of Hazardous Substances in Electric and Electronic Equipment (RoHS)

The Restriction of Hazardous Substances (RoHS) regulations apply to electrical and electronic equipment and do not specifically regulate plastic raw materials. Nevertheless, based on available information and documentation provided by our raw material suppliers, this product complies with the substance restrictions established under Directive 2002/95/EC and Directive 2011/65/EU (RoHS), as amended, including the applicable restrictions for cadmium (Cd), lead (Pb), mercury (Hg), hexavalent chromium (Cr(VI)), polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE), bis(2-ethylhexyl) phthalate (DEHP), benzyl butyl phthalate (BBP), dibutyl phthalate (DBP), and diisobutyl phthalate (DIBP).

Ozone Depleting Substances European Union

Based on the product formulation and available supplier information, no substances listed in Annexes I or II of Regulation (EU) 2024/590 are intentionally added or used in the manufacture of this product.

Ozone Depleting Substances United States

Based on the product formulation and manufacturing process, no Class I or Class II ozone-depleting substances regulated under the U.S. Clean Air Act Amendments of 1990 are intentionally added or used in the production of this product. This includes CFCs, HCFCs, halons, carbon tetrachloride, and 1,1,1-trichloroethane.

Persistent Organic Pollutants - POPs Commission Regulation (EU) 2019/1021

Based on the product formulation and available supplier information, compounds regulated under Regulation (EU) 2019/1021 on Persistent Organic Pollutants (POPs), as amended, are not intentionally added or used in the manufacture of this product and are not expected to be present. This statement is based on formulation and supplier data; the product has not been analytically tested for these substances.

Switzerland VOC Declaration

Based on available formulation and supplier information, this product contains less than 3% volatile organic compounds (VOCs) consisting of substances included in the positive lists of the Swiss VOC incentive tax legislation (“VOC-Lenkungsabgabe”).

Epoxy Derivatives

The epoxy derivatives BADGE (Bisphenol A Diglycidyl Ether), BFDGE (Bisphenol F Diglycidyl Ether), and NOGE (Novolac Glycidyl Ether) are not intentionally used in the manufacture or formulation of this product as plasticizers, additives, or raw materials. Accordingly, this product complies with the applicable requirements of Commission Regulation (EC) No. 1895/2005 on the restriction of certain epoxy derivatives in materials and articles intended to come into contact with food.

Halal Certification

No Halal certification has been obtained for this product. Accordingly, the product should not be represented as Halal certified.

Kosher Certification

No Kosher certification has been obtained for this product. Accordingly, the product should not be represented or marketed as Kosher certified.

Latex

Based on the manufacturing, handling, and packaging processes employed, no latex-containing or natural rubber-containing materials are intentionally used in connection with this product.

Biocidal Products

Biocidal products, as defined in Article 3 of Regulation (EU) No. 528/2012 concerning the making available on the market and use of biocidal products, are not intentionally used in the manufacture or formulation of this product.

However, this product has not been specifically tested for the presence of biocidal active substances or biocidal products. Accordingly, no analytical confirmation regarding the absence of such substances is provided.

Nanomaterials

Nanomaterials, defined as natural, incidental, or manufactured materials containing particles in an unbound state or as aggregates or agglomerates, where 50% or more of the particles in the number-size distribution have one or more external dimensions in the range of 1 nm to 100 nm, are not intentionally used in the manufacture or formulation of this product.

However, this product has not been specifically tested for the presence of nanomaterials. Accordingly, no analytical confirmation regarding the absence of such materials is provided.

TSCA Section 6(h) is a provision of the U.S. Toxic Substances Control Act (TSCA)

Based on the raw materials used and the manufacturing processes employed, the following TSCA Section 6(h) substances are n intentionally added to the product and are not expected to be present:
- Phenol, isopropylated, phosphate (3:1) (CAS No. 68937-41-7)
- Bis(pentabromophenyl) ether (DecaBDE) (CAS No. 1163-19-5)
- 2,4,6-Tri-tert-butylphenol (CAS No. 732-26-3)
- Hexachlorobuta-1,3-diene (HCBD) (CAS No. 87-68-3)
- Pentachlorobenzenethiol (PCTP) (CAS No. 133-49-3)

Phthalates

Based on the product formulation and available supplier information, phthalates are not intentionally added or used in the manufacture of this product. This statement is based on formulation and supplier data; the product has not been analytically tested for the presence of phthalates.

CEN Standard EN 13432:2004

Based on its composition and intended performance characteristics, this product is not suitable for composting and does not meet the criteria specified in CEN Standard EN 13432:2004.

Energy Recovery - CEN Standard EN 13431:2004

This product is suitable for energy recovery in accordance with the principles of CEN Standard EN 13431:2004, Packaging – Requirements for packaging recoverable in the form of energy recovery, including specification of minimum inferior calorific value. Polypropylene provides a calorific value of approximately 24 MJ/kg when recovered through appropriate energy recovery processes.

European Union Deforestation Regulation

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Regulation (EU) 2023/1115 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation (EUDR) applies only to the relevant commodities and derived products listed in Annex I of the Regulation, namely cattle, cocoa, coffee, oil palm, rubber, soya, wood, and specified products derived therefrom.

This product is not identified as a “relevant product” within the scope of Annex I of Regulation (EU) 2023/1115. Accordingly, the requirements and obligations of the EUDR are not applicable to this product.

This assessment is based on the current product composition and the scope of Annex I of Regulation (EU) 2023/1115 as applicable at the date of this declaration.

Commission Regulation (EU) 2022/1616

This product is not within the scope of Commission Regulation (EU) 2022/1616, as amended, relating to recycled plastic materials and articles intended to come into contact with foods. Therefore, the specific requirements of this Regulation are not applicable.

Waste Electrical and Electronic Equipment

This product is outside the scope of Directive 2012/19/EU on Waste Electrical and Electronic Equipment (WEEE) and is therefore not subject to the requirements of that Directive.

MOAH/MOSH

Mineral Oil Aromatic Hydrocarbons (MOAH) are not intentionally added during the manufacture of this product. However, this product has not been specifically tested for the presence of MOAH. Mineral Oil Saturated Hydrocarbons (MOSH) may be present at trace levels as a result of the manufacturing process and/or the origin of the raw materials used.

Please note that, with regard to MOSH, only white paraffinic mineral oils that comply with Regulation (EU) No. 10/2011 on plastic materials and articles intended to come into contact with food (FCM Reference No. 95883) are used in the manufacture and/or formulation of this product.

Information on the Safety Data Sheet

REACH compliance information, including details regarding the presence of Substances of Very High Concern (SVHCs) identified on the European Chemicals Agency (ECHA) Candidate List, is provided in Section 15 (Regulatory Information) of the corresponding European Union Safety Data Sheet (SDS). The latest SDS documents are available at www.velogy.com

- If the SVHC section is marked "Not Applicable", this indicates that, based on available information and the regulatory thresholds in force on the SDS issue date, the product does not contain any Candidate List SVHCs that are subject to disclosure requirements (Less than 0.1 %)

- Information regarding the presence of substances classified as carcinogenic, mutagenic, or toxic for reproduction (CMR Categories 1A, 1B, or 2) in accordance with Annex VI of Regulation (EC) No. 1272/2008 (CLP Regulation), at concentrations requiring disclosure and/or classification of the product as hazardous, is provided in Section 2 of the applicable Safety Data Sheet (SDS).

- For information regarding endocrine-disrupting properties of substances contained in this product, please refer to the applicable Safety Data Sheet (SDS), specifically Sections 2.3, 11.2, and 12.6. These sections provide available information on endocrine-disrupting properties relevant to human health and the environment, in accordance with the applicable regulatory and hazard communication requirements.

Explanation on the wording "Amended"

Unless otherwise stated, all regulations, directives, standards, guidelines, notifications, resolutions, and other legal or regulatory instruments referenced in this document shall be deemed to include their original text together with any applicable amendments, revisions, updates, corrigenda, delegated acts, implementing acts, successor legislation, and other relevant regulatory provisions in force as of the release date of this document.

References to specific regulatory requirements are therefore intended to reflect the applicable legal framework in effect at the date of issuance of this document

Disclaimer

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The information contained in this document is believed to be accurate and reliable to the best of our knowledge as of the date of publication. This document is intended solely to provide general information regarding the safe handling, use, processing, storage, transportation, disposal, and release of the product.

The information provided herein does not constitute, and shall not be construed as, a warranty, guarantee, or quality specification of any kind, whether express or implied, including, without limitation, any implied warranties of merchantability, fitness for a particular purpose, non-infringement, or regulatory compliance.

Users are solely responsible for determining the suitability of the product for their intended applications and for ensuring that the product is used, handled, processed, stored, transported, and disposed of safely and in compliance with all applicable laws, regulations, and industry requirements.In addition to any use restrictions specifically identified in this document, Velogy reserves the right, at its sole discretion, to prohibit or restrict the sale of its products for certain applications or end uses.

For further information, please contact: RegulatoryComplianceROP@velogy.com