



Atul Ltd
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July 12, 2024

REACH compliance status and product information

Dear Partner,

Please find the latest information on REACH regulation along with the compliance status of Atul Ltd (Atul) and confirmation on product information for responsible use of its products across the supply chain.

REACH regulation

Companies are responsible for registering chemical substances that are manufactured or imported to the member states of European Union (EU) in quantities of one ton or more per year under the REACH (Registration, Evaluation, Authorization and Restriction of Chemicals), a regulation of the European Union, entered into force on June 01, 2007 as the REACH Regulation (EC) no. 1907 | 2006.

REACH compliance

Atul confirms that all products supplied to EU are in compliance with the REACH regulation (EC) no. 1907 | 2006. The Company confirms that all substances that require registration have been registered by it or by its suppliers, unless they are exempted from registration. The registration number(s) of the classified ingredient(s) of a substance and substances in mixtures are given in Section 1 and Section 3 of SDS, respectively. The Company also confirms that the monomers or other substances of polymers have been registered by it or by its suppliers, or are exempted from registration, and the registration number(s) of the classified monomers or other substances of polymers are given in Section 3 of the SDS.

Substances of very high concern (SVHC) compliance

The candidate list of SVHC contains 241 chemicals as on June 27, 2024. The Company provides the updated safety data sheets (SDS) of the products containing substances of the candidate list in Section 3 of SDS if the concentration is more than 0.1 % (w/w); even it was supplied during the past 12 months to EU as per Article 31 (1) of REACH. The Company has an internal management system either to maintain SVHC below the limit or to substitute with possible alternatives.

Restricted substances list (RSL) compliance

The products of the Company do not contain any of the substances restricted in Annex XVII of EC 1907 | 2006 (REACH) more than the legal concentration limits as defined in the restriction conditions and do not contain substances subject to authorisation listed in Annex XIV of EC 1907 | 2006 (REACH) with a concentration above 0.1% (w/w).

Document no.: REACH | PARTNER | CONFIRMATION | 2024 | 03

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CIN: L99999GJ1975PLC002859



Lalbhai Group

UK REACH compliance

The EU REACH chemicals regulation was introduced in the UK and became a law in that country on January 01, 2021 at the end of the BREXIT transition period. UK REACH requires the substances either manufactured or imported from outside UK, including substances in formulations, monomers and other substances in polymers in quantities of one ton and above per year per legal entity to be registered, unless exempted from registration.

Atul confirms that all products supplied to the UK are in compliance with the UK REACH regulation. The Company confirms that all substances that must be registered have been grandfathered or complied by it or its suppliers, unless exempted from registration.

The Company notifies to its customers if a SVHC is put on the EU and | or UK REACH candidate list and if it is present in substances | formulations | polymers manufactured by the Company whose concentration is above 0.1% (w/w). It provides information to its customers on products containing SVHC over a limit of 0.1% (w/w) in accordance to Article 33 of UK REACH.

Turkey-REACH (KKDIK) compliance

Chemical substances on their own or in mixtures or intended to release in articles manufactured in or imported to Turkey in quantities of one ton and more per year per legal entity must be registered with the Ministry of Environment and Urbanization (MoEU), Government of Turkey. KKDIK is an acronym in Turkish for Registration, Evaluation, Authorization and Restriction of Chemicals. KKDIK registration includes two stages, namely Pre-SIEF (Pre-registration). The pre-registration phase ended on December 31, 2020 and the registration phase will be completed by December 31, 2026, December 31, 2028 and December 31, 2030 based on the Turkey-volumes and nature of the product(s).

Atul confirms that all products supplied to Turkey are in compliance with the KKDIK regulation and completed pre-registrations for all the required substances for its customers in Turkey. The Company is prepared to complete the required registrations by December 31, 2026, December 31, 2028 and December 31, 2030 based on the Turkey-volumes and nature of the product(s).

Product information for responsible use

The Company displays product information through labels that contain product identifiers, weighing details, hazardous effects of the product on human health and environment along with precautionary measures. It communicates the physicochemical, toxicological and eco-toxicological properties of products across their value chain in the form of safety data sheets (SDS). The product labels are prepared in accordance with the Commission Regulation (EU) 2020/878 of CLP regulation EC no. 1272 | 2008 for Europe and Globally Harmonised System of Classification and Labelling of chemicals for all other countries.

We ensure implementation of the United Nations Model regulation in transporting dangerous goods safely.

For any assistance | clarification, please contact us at product_safety@atul.co.in

Yours sincerely,

For Atul Ltd



Annamaneni Venkaiah
General Manager - Product Safety and REACH Regulations