

June 25, 2020

Environmental Statement

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Dear Customer,

This environmental statement covers the raw materials and/or components combined to make the following products to the best of our knowledge and confirmations from our suppliers.

INK-417 ink series	Hardener BH/GL
INK-434 ink series	Hardener H1
INK-438 ink series	Hardener LMN
INK-478 ink series	Retarder SV3
INK-B ink series	Retarder SV5
INK-B/GL ink series	Retarder TPD
INK-M ink series	Retarder VZ
INK-N ink series	Retarder Paste VP
INK-HS ink series	Thinner 35928
INK-O ink series	Thinner 38472
INK-P ink series	Thinner 38571
INK-PG ink series	Thinner 472
INK-PH ink series	Thinner B
INK-PK ink series	Thinner BGA
INK-PM ink series	Thinner C
INK-PP ink series	Thinner PPTPV
INK-PV ink series	Thinner TPV
INK-R ink series	Thinner TPV2
INK-SK ink series	Thinner UV 700299
INK-TPR ink series	Thinner VD
INK-TPU ink series	Thinner VD-00
INK-TPY ink series	Thinner VDS380
INK-UPP ink series	Thinner VDS1015
INK-UV2002 ink series	Additive 439
INK-UVA ink series	Adhesive Primer 484
INK-UVAB ink series	Adhesion Promoter FX209
INK-UVC ink series	Antistatic Gel Reducer
INK-UVE ink series	AS1 Antistatic Liquid
INK-UVG ink series	Dibasic Ester
INK-UVHC ink series	Long Life Oil
INK-W ink series	Pad Cleaner
Hardener 440	Polypropylene Powder 1205121
Hardener BH	Synthetic Cleaner
Hardener BH/N	

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REACH (January 16, 2020 – 205 substances)

These products do not contain any of the substances listed in REACH Candidate List of Substances of Very High Concern (SVHC), updated on January 16, 2020 (currently 205 substances).

The SVHC are subject of authorization and restriction per REACH Regulation Article 57:

- CMR = cancerogenic, mutagenic, toxic for reproduction (Cat. 1A and Cat. 1 B, according to CLP-Regulation (EC) No. 1272/2008)
- PBT = persistent, bioaccumulative, toxic
- vPvB = very persistent, very bioaccumulative
- scientific evidence of probable serious effects to human health or the environment

The mentioned substances are not part of the product formulations. According to the information from raw material suppliers these substances are not contained in the raw materials, except in technical unavoidable trace contents, potentially. These substances are not used during the manufacturing process. All products meet the maximum threshold limit value of 0.1 % concentration for each substance.

REACH Exceptions:

Product	Component & CAS# contained on SVHC List	% contained in product
INK-UV2002 #1 White only	Tris(4-nonylphenyl, branched and linear) phosphite (TNPP) with $\geq 0.1\%$ w/w of 4-nonylphenol, branched and linear (4-NP) / No CAS#	0.35
TP247	Tris(4-nonylphenyl, branched and linear) phosphite (TNPP) with $\geq 0.1\%$ w/w of 4-nonylphenol, branched and linear (4-NP) / No CAS#	0.35
INK-PC	Tris(4-nonylphenyl, branched and linear) phosphite (TNPP) with $\geq 0.1\%$ w/w of 4-nonylphenol, branched and linear (4-NP) / No CAS#	0.35
INK-PG	Tris(4-nonylphenyl, branched and linear) phosphite (TNPP) with $\geq 0.1\%$ w/w of 4-nonylphenol, branched and linear (4-NP) / No CAS#	0.35
INK-PX White and Black only	Tris(4-nonylphenyl, branched and linear) phosphite (TNPP) with $\geq 0.1\%$ w/w of 4-nonylphenol, branched and linear (4-NP) / No CAS#	0.175
INK-478	Tris(4-nonylphenyl, branched and linear) phosphite (TNPP) with $\geq 0.1\%$ w/w of 4-nonylphenol, branched and linear (4-NP) / No CAS#	0.175

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RoHS, RoHS 2, and RoHS 3

These products comply with the requirements of directive 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment (recast of RoHS directive 2002/95/EC), amended by Delegate Directive (EU) 2015/863 and 2016/585.

The mentioned products do not contain any of the following substances in amounts exceeding the maximum concentration levels.

Cadmium (Cd) (0.01%)

Lead (Pb) (0.1%)

Mercury (Hg) (0.1%)

Hexavalent Chromium (Cr VI) (0.1%)

Polybrominated Biphenyls (PBB) (0.1%)

Polybrominated Diphenyl Ethers (PDBE, including Decabrominated Diphenylether (Deca-BDE)) (0.1%)

Bis (2-Ethylhexyl) phthalate (DEHP) (0.1%)

Butyl benzyl phthalate (BBP) (0.1%)

Dibutyl phthalate (DBP) (0.1%)

Diisobutyl phthalate (DIBP) (0.1%)

According to the information provided by the suppliers of the constituent components, these substances are not part of the raw material. They are not used during the manufacturing process.

Persistent Organic Pollutants (POP)

These products comply with Annex I of EU Regulation No 2019/1021 on the restriction of persistent organic pollutant (POP) chemicals.

According to the information provided by the suppliers of the constituent components, these substances are not part of the raw material. They are not used during the manufacturing process.



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EU MDR: REGULATION (EU) 2017/745 on medical devices (EU MDR)

These products do not contain any of the substances listed in the EU MDR, Annex I, Chapter II, Section 10.4.1 - CMR 1A/1B substances with Hazard Statement Codes H340, H350, and H360 for MDR affected Mutagenic, Carcinogenic, and Reproductive toxicants 1A/1B and Endocrine disruptors in the REACH Candidate list. Exceptions are listed below.

EU MDR Exceptions:

Product	Component & CAS#	% contained in product
Antistatic Gel Reducer	Solvent naphtha (petroleum), light arom. / 64742-95-6	40-60
AS1 Antistatic Liquid	Solvent naphtha (petroleum), light arom. / 64742-95-6	25-50
Hardener BH/GL	Solvent naphtha (petroleum), light arom. / 64742-95-6	25-50
Ink-417	Solvent naphtha (petroleum), light arom. / 64742-95-6	5-10
Ink-434	Solvent naphtha (petroleum), light arom. / 64742-95-6	20-25
Ink-478	2-methoxypropyl acetate / 70657-70-4	0.1-0.25
Ink-478	Tris(nonylphenyl) phosphite / 26523-78-4	0.1-0.25
Ink-P	Solvent naphtha (petroleum), light arom. / 64742-95-6	5-10
Ink-PH	Solvent naphtha (petroleum), light arom. / 64742-95-6	5-10
Ink-PK	Solvent naphtha (petroleum), light arom. / 64742-95-6	10-20
Ink-PM	Solvent naphtha (petroleum), light arom. / 64742-95-6	25-50
Ink-PP	Solvent naphtha (petroleum), light arom. / 64742-95-6	10-20
Ink-SK	Solvent naphtha (petroleum), light arom. / 64742-95-6	10-20
Ink-TPR	Solvent naphtha (petroleum), light arom. / 64742-95-6	2.5-10
Ink-TPU	Solvent naphtha (petroleum), light arom. / 64742-95-6	2.5-10
Ink-TPY	Solvent naphtha (petroleum), light arom. / 64742-95-6	20-25
Ink-UPP	Solvent naphtha (petroleum), light arom. / 64742-95-6	10-20
Retarder TPD	Solvent naphtha (petroleum), light arom. / 64742-95-6	5-10
Synthetic Cleaner Ink Remover	2-methoxypropanol / 1589-47-5	0-1
Thinner PPTPV	Solvent naphtha (petroleum), light arom. / 64742-95-6	50-100
Thinner TPV	2-methoxypropyl acetate / 70657-70-4	0.1-0.3
Thinner VD-00	Solvent naphtha (petroleum), light arom. / 64742-95-6	25-50
VD Thinner	Solvent naphtha (petroleum), light arom. / 64742-95-6	20-30

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Proposition 65 (January 03, 2020)

These products do not contain ingredients listed in the California Proposition 65 list (dated January 03, 2020) as part of their formulations. An exception is black color shades which may contain CAS# 1333-86-4 Carbon Black pigment. This carbon black is not, however, “airborne and unbound” as it is offered in the pad printing inks. Other exceptions (where applicable) are listed with each respective product.

Prop 65 Exceptions:

Product	Component & CAS#	% contained in product
Adhesion Promoter FX209	Ethylbenzene / 100-41-4	10-20
Adhesive Primer 484	Ethylbenzene / 100-41-4	10-20
Antistatic Gel Reducer	Cumene / 98-82-8	0.5-1.5
AS1 Antistatic Liquid	Ethylbenzene / 100-41-4	0-1
Dibasic Ester	Methanol / 67-56-1	0-0.2
Hardener BH/N	Ethylbenzene / 100-41-4	2.5-5
Hardener H1	Ethylbenzene / 100-41-4	1-2.1
Ink-417	Ethylbenzene / 100-41-4	2.5-5
Ink-434	Ethylbenzene / 100-41-4	1-2.5
Ink-434	Toluene / 108-88-3	0.1-0.25
Ink-PK	Ethylbenzene / 100-41-4	1-2.5
Ink-PM	Ethylbenzene / 100-41-4	1-2.5
Ink-TPU	Ethylbenzene / 100-41-4	1-3.4
Pad Cleaner	Methyl Isobutyl Ketone / 108-10-1	0-1
Pad Cleaner	Methanol / 67-56-1	1-20
Thinner 472	Ethylbenzene / 100-41-4	1-2.5
Thinner B	Ethylbenzene / 100-41-4	0-5
Thinner VDS1015	Ethylbenzene / 100-41-4	5-10

IMDS (International Material Data System)

The IMDS Committee, many years ago, created an IMDS number for all pad and screen printed inks (this includes the thinner and hardener utilized in those processes). That number is “Published Material ID: 9448512”. There is no separate submission for individual pad printing inks, thinners, hardeners, etc.

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Conflict Minerals

Trans Tech supports the aims and objectives of the US legislation on the supply of Conflict Minerals.

We do not knowingly procure any tin, tantalum, tungsten or gold that originates from the Conflict Region, unless they originate from mines or smelters that are certified as "conflict free". To ensure compliance with the Dodd-Frank Act, we are asking our suppliers to undertake reasonable due diligence with their supply chains to determine whether the specified metals are being sourced from:

1. mines and smelters outside the Conflict Region or
2. mines and smelters which have been certified by an independent third party as "conflict free" if sourced within the Conflict Region.

This due diligence includes having our suppliers provide written documentation as to whether products containing the raw materials tin, tantalum, tungsten, and gold used in the manufacture of our products, originate from outside the Conflict Region or, if they originate from within the Conflict Region, that the mines or smelters be certified as "conflict free" by an independent third party. If we discover that tin, tantalum, tungsten or gold procured by us is produced in the Conflict Region from facilities that are not certified "conflict free" facilities, we will use our best efforts to transition the product to be conflict free.

Asbestos

According to the information from suppliers of the constituent components, asbestos is not part of the raw materials of the above listed products. Asbestos is not part of the formulations and is not intentionally added during the manufacturing process.

Phthalates

According to the information from suppliers of the constituent components, phthalates are not part of the raw materials of the above listed products. Phthalates are not part of the formulations and are not intentionally added during the manufacturing process.

Animal Origin

According to the information from suppliers of the constituent components and the processes used to manufacture our products, the above listed items are free from:

1. Transmissible Spongiform Encephalopathy (TSE)
2. Bovine Spongiform Encephalopathy (BSE)
3. Animal derived materials



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Latex

According to the information from suppliers of the constituent components and the processes used to manufacture our products, the above listed items are not produced with latex. Latex is not part of the formulations and is not intentionally added during the manufacturing process.

BPA (Bisphenol A)

The following products do not have Bisphenol A (BPA) as an ingredient of their formulations. BPA is not intentionally added during the production of these products.

INK-417 ink series	Hardener H1
INK-434 ink series	Hardener LMN
INK-438 ink series	Polypropylene Powder 1205121
INK-B ink series (exception: may contain less than 10mg/kg / 10ppm / 0.001%)	Retarder TPD
INK-B/GL ink series (exception: may contain less than 10mg/kg / 10ppm / 0.001%)	Retarder VZ
INK-N ink series (exception: contains 20-25%)	Thinner 472
INK-P ink series	Thinner 35928
INK-PH ink series	Thinner 38472
INK-PM ink series	Thinner 38571
INK-PP ink series	Thinner B
INK-PV ink series	Thinner BGA
INK-SK ink series	Thinner C
INK-W ink series (exception: may contain less than 10mg/kg / 10ppm / 0.001%)	Thinner PPTPV
Ink-UPP ink series	Thinner TPV
Hardener BH	Thinner TPV2
Hardener BH/N	Thinner VD
Hardener BH/GL	Thinner VD-00
	Thinner VDS380
	Adhesive Primer 484

Chlorinated Paraffins

The following products do not have Chlorinated Paraffins as an ingredient of their formulations. Chlorinated Paraffins are not intentionally added during the production of these products.

INK-B ink series
Hardener BH

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PCB's

The following products do not have PCB's as an ingredient of their formulations. PCB's are not intentionally added during the production of these products.

INK-B ink series
Hardener BH

Polychloronaphthalenes

The following products do not have Polychloronaphthalenes as an ingredient of their formulations. Polychloronaphthalenes are not intentionally added during the production of these products.

INK-B ink series
Hardener BH

Antimony Trioxide

The following products do not have Antimony Trioxide as an ingredient of their formulations. Antimony Trioxide are not intentionally added during the production of these products.

INK-B ink series
Hardener BH

Nitrosamines

The following products do not contain any known Nitrosamine impurities, which include but are not limited to:

- N-nitrosodimethylamine (NDMA),
- N-nitrosodiethylamine (NDEA),
- N-diisopropylnitrosoamine (NDIPA),
- N-ethyl-N-isopropylnitrosoamine (NEIPA),

which are considered to be carcinogenic. These substances are not part of the formulation recipes. They are not intentionally added. According to the information from raw material suppliers, these substances are not contained in the raw materials, neither as a constituent nor as known impurity.

INK-434 ink series



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The above information is provided based on the best of our knowledge and from information supplied by raw material suppliers. Please feel free to contact me if you should have any questions.

Sincerely,

A handwritten signature in black ink that reads "Prasanth".

Prasanth Bijjam
Consumables Production Manager
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