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Statement on Compliance with Regulation (EC) No 1907/2006 (REACH)

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Version: 1.3 (supersedes v1.2 of 08.10.2026: product scope extended to thermochromic and photochromic pigments, CoaTech products and DecoTech decorative granulates; OSC Grade and SC Grade covered without the market-launch condition; references updated to CT-REG-001 v2.1, CT-REG-010 v3.1, CT-REG-011 v1.4, CT-REG-031 and CT-REG-030 v1.1; entry 78 assessment and supply-chain roles revised)

Scope: all products placed on the market by Chemical Technologies SIA. See also: Doc. ID CT-REG-001 v2.1, CT-REG-010 v3.1, CT-REG-011 v1.4, CT-REG-031 and CT-REG-030 v1.1

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1. Scope

This Statement covers all products manufactured and/or placed on the market by Chemical Technologies SIA (“ChemTech”): pearlescent pigments (including the CTA Series, 25 grades), aluminium and bronze pigments, fluorescent, luminous, thermochromic and photochromic pigments, mica flakes, PET glitters, plastic beads and PU powders, in all product forms supplied by ChemTech (Loose Powder, PG Powder, Aqua Powder, DS Powder, OSC Grade and SC Grade), as well as the CoaTech water-based products for paper and board (barrier coatings, optical brighteners and dyes) and the DecoTech decorative granulates.

All ChemTech products are substances or mixtures within the meaning of Article 3(1) and 3(2) of REACH. None of them is an article within the meaning of Article 3(3).

2. Regulatory basis

Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) was adopted on 18 December 2006 and entered into force on 1 June 2007, establishing the European Chemicals Agency (ECHA). This Statement refers to REACH as amended and to its consolidated version applicable on the issue date, and in particular to:

- the Candidate List of Substances of Very High Concern (SVHC) for Authorisation, published by ECHA under Article 59(10);
- Annex XIV — the Authorisation List (Title VII, Article 56);
- Annex XVII — Restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles (Title VIII, Article 67), including entry 78 as introduced by Commission Regulation (EU) 2023/2055 and amended by Commission Regulation (EU) 2026/1168;
- Annex II — Requirements for the compilation of Safety Data Sheets, as amended by Commission Regulation (EU) 2020/878.

Classification and labelling of ChemTech products follow Regulation (EC) No 1272/2008 (CLP).

3. Registration (Articles 5 and 6)

All substances contained in ChemTech products that are subject to registration are registered with ECHA — by Chemical Technologies SIA in its capacity as importer, by the Only Representative appointed by the non-EU manufacturer under Article 8, or by an EU manufacturer or importer upstream in our supply chain — or are exempt from registration under Articles 2 and 6 or Annexes IV and V of REACH. For the mixtures formulated by ChemTech (PG, Aqua and DS Powder, OSC Grade and SC Grade, and the CoaTech products), ChemTech acts as a downstream user; the registration of the constituent substances is the responsibility of their EU manufacturers or importers. Where applicable, registration numbers are stated in Section 1 or Section 3 of the Safety Data Sheet.

4. Candidate List of Substances of Very High Concern (SVHC)

Reference version: the Candidate List as published by ECHA and current on the issue date of this Statement (latest update taken into account: 4 February 2026, 253 entries). ChemTech reviews every update against the composition of its products.

Declaration. To the best of our knowledge, based on our own composition data and on the information provided by our suppliers, none of the substances included in the Candidate List is present in any ChemTech product in a concentration above 0.1 % weight by weight (w/w). Consequently, no information obligations under Article 33 and no notification obligations under Article 7(2) of REACH arise for ChemTech products.

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5. Annex XIV — Authorisation List

Declaration. None of the substances listed in Annex XIV of REACH, in the version applicable on the issue date of this Statement, is used in the manufacture of, or is present in, ChemTech products. No authorisation under Title VII of REACH is required for the placing on the market or the use of ChemTech products.

6. Annex XVII — Restrictions

Declaration. ChemTech products comply with the conditions of the restrictions laid down in Annex XVII of REACH, in the version applicable on the issue date. Depending on the entry, these conditions range from concentration limits and use-specific conditions to a general prohibition of the manufacture, placing on the market or use of the substance concerned.

Annex XVII contains a wide range of substance-specific and use-specific restrictions applicable to various materials, components and product categories. Due to the extensive nature of these restrictions, it is not practical to list each of them individually in this Statement. Nevertheless, we ensure compliance by:

- monitoring updates to Annex XVII and other relevant REACH provisions;
- assessing substances and materials used in our products against all applicable restrictions;
- working closely with our suppliers to verify conformity throughout the supply chain;
- implementing internal procedures to prevent the use of restricted substances or uses in our products (incl. laboratory testing).

Given the specifics of our products, we provide a more precise description below regarding microplastics.

Entry 78 (synthetic polymer microparticles, Commission Regulation (EU) 2023/2055 as amended by Commission Regulation (EU) 2026/1168). ChemTech products are assessed in three groups:

- **Inorganic products** — pearlescent pigments (natural- and synthetic-mica based, including all 25 CTA grades), aluminium and bronze pigments, luminous pigments and mica flakes — are inorganic materials that fall outside the definition of synthetic polymer microparticles. For the CTA Series in all supplied forms (Loose Powder, PG Powder, Aqua Powder, DS Powder, OSC Grade and SC Grade) this is confirmed by the signed Statement on the Absence of Microplastics (Doc. ID CT-REG-001, v2.1). The components of the anti-dusting treatment of OSC Grade and SC Grade are not synthetic polymer microparticles (Statements on the Anti-dusting Treatment, Doc. ID CT-REG-031 and CT-REG-030, v1.1, available on request).
- **Polymer-based products** — PET glitters, plastic beads, PU powders, resin-based fluorescent pigments, microencapsulated thermochromic and photochromic pigments and DecoTech decorative granulates — fall within the definition of synthetic polymer microparticles. They are placed on the market exclusively for use at industrial sites (paragraph 4(a) of entry 78). As required by paragraph 7, ChemTech provides in the safety data sheets the instructions for use and disposal, the statement that the synthetic polymer microparticles supplied are subject to the conditions laid down by entry 78, the information on their quantity or concentration and generic information on the identity of the polymers. ChemTech does not manufacture these synthetic polymer microparticles; it purchases them from EU suppliers or imports them. Part of these products is supplied in the original packaging and part is repacked by ChemTech at its site in Riga. For the repacked products, ChemTech is an industrial downstream user of synthetic polymer microparticles and submits the information required by paragraph 11 to ECHA from 2027; for products supplied in the original packaging, the reporting obligation of paragraph 11 rests with the manufacturers and with the industrial downstream users. The reporting obligation of paragraph 12 does not apply to products supplied under paragraph 4(a).
- **CoaTech products** — optical brighteners and dyes are aqueous solutions and do not contain synthetic polymer microparticles. Barrier coatings are formulated by ChemTech at its site in Riga from aqueous polymer dispersions, which contain synthetic polymer microparticles, and are placed on the market exclusively for use at industrial sites (paragraph 4(a) of entry 78). ChemTech provides the information required by paragraph 7 in their safety data sheets and, as an industrial downstream user of synthetic polymer microparticles, submits the information required by paragraph 11 to ECHA from 2027.

The compliance of the final product (e.g. a plaster, coating or ink in which the particles are permanently incorporated into a solid matrix, paragraph 5(c)) remains the responsibility of the manufacturer of the final product. From 22 June 2028, under Regulation (EU) 2026/1168, the derogation of paragraph 5(c) applies only where the intended end use of the final product has a duration of one year or longer; manufacturers of short-life applications should verify the applicability of this derogation.

7. SCIP database (Directive 2008/98/EC, Article 9(1)(i))

The obligation to notify the SCIP database of ECHA under the Waste Framework Directive applies to suppliers of articles containing Candidate List substances above 0.1 % (w/w). ChemTech products are substances and mixtures, not articles; in

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addition, they do not contain Candidate List substances above 0.1 % (w/w). No SCIP notification obligation therefore arises for ChemTech products.

DISCLAIMER: This Statement is based on our best knowledge at the time of issue, on the composition data of our products and on information received from our suppliers, and on the regulations in force on the issue date. It does not constitute a legally binding warranty. The suitability of a product for a particular application, and the compliance of the final product with the regulations applicable to it, remain the responsibility of the manufacturer of the final product. Chemical Technologies SIA assumes no responsibility for compliance with legal requirements if its products are processed or modified by third parties.

Viktor Denezhnikov
Chairman of the Board
Date: 29.10.2026

