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Declaration

According to Regulation (EC) No. 1907/2006 (REACH) our company, as manufacturer of mixtures, is only a downstream user given that we do not produce or import substances as defined by the above-stated regulation and most of our raw materials are mixtures themselves.

The data on the composition of these raw materials is based on the Material Safety Data Sheets we have received from our suppliers. The Material Safety Data Sheets are compiled by our suppliers according to the applicable regulations which do not require listing all substances contained.

Furthermore, the raw materials used are produced under industrial conditions and may, therefore, contain inevitable traces of contamination.

Based on the information provided by our suppliers, all raw material or their ingredients have been pre-registered and will be registered by the corresponding deadline applicable to production or import volume.

The substances which are mentioned on the "Candidate List of Substances of Very High Concern" for inclusion in Annex XIV of the REACH regulation, released 16 January 2020, are not contained as constituent ingredients of our products.

It should be noted, however, that substances of very high concern (SVHC) might not only be contained in the ink film, but also in the substrate or other components of your product, so that both concentrations of the corresponding SVHC might have to be added to determine the total amount.

We would like to point out that a duty of disclosure, in accordance with Article 33 of the REACH Regulation for manufacturers of preparations, does not exist on principle. Article 33 governs the duty of disclosure for manufacturers of articles containing a substance of very high concern in a concentration exceeding 0.1 % (w/w). If the concentration of an SVHC in an article is less than 0.1 % (w/w), there is no obligation for the producer to relay the information within the supply chain.

Within the supply chain, manufacturers of mixtures are required to forward or communicate safety-related information concerning their products in their Material Safety Data Sheets. This applies, in particular, to any materials classified as "substances of very high concern".

In case an authorization procedure is required for any ingredients of our products, we will proceed to inform our customers immediately.

Weissenburg i. Bay., 17 January 2020

Pröll GmbH

Reinhard Port
General Manager

i. A.

Marco Auer
Quality Manager