PLENCO
Together Through Chemistry

June 24, 2026

General Information on the Application of REACH for Plenco Customers

This memorandum has been prepared as a standard response to questions we receive from our molding material and resin customers about our position and activities regarding REACH, the chemical control law of the European Union. Plenco has in place a REACH compliance program and has retained Ramboll's Global Product Safety and Stewardship practice to provide technical and regulatory support, and to serve as "Only Representative" in support of our business in Europe.

FOR OUR NORTH AMERICAN CUSTOMERS
As regards REACH, we believe that in virtually all cases, neither we nor our North American molding material or resin customers will have any obligation to take any action. In drawing that conclusion, we have made the following assumptions:

- We assume you are using our products to manufacture products that meet the definition of an article and you are conducting these operations in North America, not shipping the individual components to Europe.
- We assume that you are using our molding materials or resins as sold and are not modifying them nor are you adding any substances of very high concern (SVHC) in the process of manufacturing these articles.
- We assume you are using our materials to produce these articles in a conventional manner, as opposed to using them in some other way.

Given the above assumptions, we believe neither you nor we have any obligations under REACH if the manufactured articles are shipped to Europe*.

FOR OUR EUROPE BASED CUSTOMERS
Plenco has fulfilled all applicable EU REACH compliance obligations, an overview of our current position is provided herein, and due to confidentiality considerations, further details are available upon request:

- We have registered, as needed, the chemicals used as raw materials in our molding materials and resins that are shipped to Europe using Ramboll as "Only Representative." These REACH registrations cover the total cumulative annual tonnages we currently ship to the EU and if the business exceeds the relevant REACH thresholds, the registrations will be updated by Plenco/Ramboll accordingly.
- The REACH registration numbers are included in our EU compliant SDS's, along with relevant guidance to customers on safe use.
- Plenco/Ramboll continually monitor the progression of substances onto the Candidate list and Annex XIV and Annex XVII.
- Plenco has EU compliant SDS's to support its molding materials and resins shipped to Europe and is available to support EU customers with fulfilling their Poison Control Center notification obligations since they are the EU duty holder.

If you have questions, please contact us as needed.

Plastics Engineering Company

(*)The obligations under REACH apply to manufacturers or importers in Europe of chemical substances or mixtures (called “preparations”), and in limited circumstances to manufacturers or importers in Europe of “articles.” The definition of “article” and additional guidance can be found at https://echa.europa.eu/regulations/reach/candidate-list-substances-in-articles. Based on our review of this information, we believe that parts you make from our materials, under the assumptions listed above, will be considered “articles” under REACH.

An importer of articles into Europe has responsibilities under REACH only in two circumstances:

1. if the articles contain a “Substance of Very High Concern (SVHC)” above a specified threshold (usually 1/10 of 1%);

Or

2. if the articles have an “intended release” of a substance from them (there is a 1 ton per year threshold).

Substances of Very High Concern (SVHC)

- The list of SVHC Candidate Substances is available online at https://chem.echa.europa.eu.
- Well-molded articles manufactured from Plenco molding compounds are not expected to contain an SVHC above a concentration of 0.1%.
- Plenco resins, with the exception of certain specialty resins that are specifically identified as containing an SVHC, do not contain an SVHC above a concentration of 0.1%.

Intended Release

For a definition of “intended release,” we refer you to Chapter 4 of the *Guidance on requirements for substances in articles*, https://echa.europa.eu/documents/10162/2324906/articles_en.pdf. A review of that information, specifically the listed examples of releases that are not considered intended (wear and tear, frictional erosion, combustion, accident, etc.), leads us to conclude that virtually all articles manufactured using our molding materials or resins under the assumptions above would not have an accompanying “intended release.”

As a result, we believe any importer of articles manufactured from our materials will be free from obligations under REACH. If, after reviewing this memo, you find that the assumptions above are not consistent with your operations (for example, if you are shipping molding materials into Europe), please let us know; we may be able to offer additional thoughts or help.

PLENCO
Together Through Chemistry

October 28, 2026

Subject: **REACH Candidate Substances of Very High Concern (SVHC), Authorization List and Substances restricted under REACH**

Dear Customer,

REACH stands for Registration, Evaluation, Authorisation and Restriction of Chemicals, from the European Union Regulation EC No 1907/2006.

Candidate List of substances of very high concern for Authorisation
(published in accordance with Article 59(10) of the REACH Regulation)
The Candidate List of Substances of Very High Concern for authorization is available from the internet site link: https://chem.echa.europa.eu/obligation-lists/candidateList (revised February 4, 2026).

> ***Regarding Melamine,*** *Residual free melamine is expected to be <0.1% for well molded articles from Plenco 007xx series melamine-phenolic copolymer thermoset compounds.*
>
> ***Regarding Dicumyl peroxide,*** *Plenco polyester molding compounds, as manufactured, may contain small amounts of dicumyl peroxide. Well molded articles produced from those compounds are expected to contain <0.1% dicumyl peroxide.*

Authorisation List
List of substances included in Annex XIV of REACH ("Authorisation List").
https://chem.echa.europa.eu/obligation-lists/authorisationList

Substances restricted under REACH
Table Annex XVII to REACH and includes all the restrictions adopted in the framework of REACH and the previous legislation, Directive 76/769/EEC.
https://chem.echa.europa.eu/obligation-lists/restrictionList (revised October 17, 2025)

> ***Regarding Formaldehyde, CAS 50-00-0, Entry 77****, Formaldehyde is intentionally used to create the phenolic polymer. Plastics Engineering Company has no control over the molding process. Trace amounts of formaldehyde are expected to be present after molding, with less than 0.1% free formaldehyde expected to exist in a well molded article.*
>
> *Limited third-party testing of formaldehyde releases from articles manufactured using PLENCO phenolic molding compounds has been completed as outlined in Appendix 14. Based on this testing, the amount of formaldehyde released from molded articles are anticipated to be below the 0.080 mg/m^3 limit as specified in paragraph 1(b) of Entry 77.*

To the best of my knowledge, none of the substances on the above-mentioned lists are expected to be present in articles above a concentration of 0.1% (w/w) molded from Plastics Engineering Company molding compounds. To the best of my knowledge, articles molded from Plastics Engineering Company molding compounds are expected to be compliant with Substances restricted under REACH, Annex XVII, and conditions of restrictions.

Sincerely,

Plastics Engineering Company

Phillip Ditter
EHS Compliance Director

PLENCO
Together Through Chemistry

June 24, 2026

Subject: **European Union RoHS II Compliance, added 4 phthalates**
(also referred to as RoHS 3 or ROHS III or EU ROHS 10)

Dear Customer,

To the best of my knowledge, Plastics Engineering Company thermoset molding compound products are in compliance with European Parliament directives regarding hazardous substances:

1. **ROHS II** (ROHS recast), Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment (EEE) recast - The maximum concentration values referred in Article 4(2) are listed in Annex II to RoHS 2. For **lead**, **mercury**, **hexavalent chromium**, polybrominated biphenyls (**PBB**) and polybrominated diphenyl ethers (**PBDE**), the maximum concentration is 0.1 % and for **cadmium**, the corresponding maximum concentration is 0.01 % by weight, in all homogeneous materials in the EEE.
http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:174:0088:0110:en:PDF

2. COMMISSION DELEGATED DIRECTIVE (EU) 2015/863 of 31 March 2015 amending Annex II to Directive 2011/65/EU of the European Parliament and of the Council as regards the list of restricted substances. Concerns above plus four additional phthalates; Bis(2-ethylhexyl) phthalate (**DEHP**), Butyl benzyl phthalate (**BBP**), Dibutyl phthalate (**DBP**) and Diisobutyl phthalate (**DIBP**).
http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32015L0863

To the best of my knowledge, the above-mentioned substances are not intentionally a part of the formulation and not intentionally added during manufacture of Plastics Engineering Company thermoset molding compound products.

Plastics Engineering Company has an ongoing process to have raw material suppliers ensure RoHS compliance.

Plastics Engineering Company thermoset molding compound products are made from some natural raw materials. Trace quantities of heavy metals are present in all natural materials. Limited testing performed by an outside lab on our molding compound products indicates we are below the 0.1% (0.01% for cadmium) threshold levels for the heavy metals mentioned and below the 0.1% threshold levels for the regulated phthalates. Plastics Engineering Company does not test for these substances as part of our quality assurance program. No testing has been performed for the brominated flame retardants.

Sincerely,

Plastics Engineering Company



Phillip Ditter
EHS Compliance Director