

REGULATORY INFORMATION SHEET

FOAM FAMILY:

STRATOCELL®, **CELLU-CUSHION®**, **CELLU-CUSHION® FLOAT**, **ETHAFOAM®**,
OPTI-STEP®, **CELL-AIRE® SPECIALITY**, **WHISPER®** and **SYNERGY®**.

REGULATIONS & DIRECTIVES

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This document aims at providing information relative to regulatory aspects and voluntary policies to our customers. All statements reported here are reviewed by SEALED AIR's technical and legal experts and are released based on data and knowledge considered to be true and accurate. It shall be noted however that the information contained therein shall not be interpreted to guarantee that the product is suitable for its intended use and it is the responsibility of the user to ensure that the product is technically suitable for the purpose for which it is being used.

REGULATIONS & DIRECTIVES

SEC Conflict Mineral Regulations

The Securities and Exchange Commission adopted a rule to require companies to publicly disclose their use of conflict minerals that originated in the Democratic Republic of the Congo (DRC) or an adjoining country.

The regulatory reform law directed the Commission to issue rules requiring certain companies to disclose their use of conflict minerals that include tantalum, tin, gold, or tungsten if those minerals are “necessary to the functionality or production of a product” manufactured by those companies.

Please refer to <https://ir.sealedair.com/node/22041/html> to view Sealed Air Corporation’s Conflict Mineral policy.

PMUC Homologation

PMUC - Produits et Matériaux Utilisés en Centrale Nucléaire. - is an acronym used to define the Products and Materials Used in nuclear power station - It is a technical norm implemented by EDF to authorize the products and materials which can be used.

Our - **SYNERGY**® product - structure passes the first step of the homologation process.

The analysis was performed on our product by a laboratory accredited by EDF in order to demonstrate this absence of Fluorine, Chlorine, Sulfur and Bromine.

Under some conditions these elements can be, aggressive and initiated corrosion from for metal (stainless steel and ferritic steel).

The second one is under the responsibility of our customers as future final user. You need to contact: EDF UTO - Noisy le Grand France.

The user will have to justify the advantages and the interest to use Ethafoam® Synergy® in comparison with the ones already validated. Please contact us to have the name and phone number of the right contact.

REACH - Regulation (EC) N° 1907/2006

Sealed Air customers who ship their products using our packaging materials are not likely to be affected by the REACH regulation since the packaging product meets the definition of an “Article”. Under REACH an Article means *an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition*. Sealed Air packaging does not contain any substances that would require registration since the two listed criteria are not likely to be met:

- (a) the substance is present in those articles in quantities totalling over 1 tonne per producer or importer per year;

(b) the substance is intended to be released under normal or reasonably foreseeable conditions of use.

In addition, based on knowledge of the manufacturing process, the Substances of Very High Concern (SVHC), update of **10th June 2022**, have not been intentionally added to the protective packaging products produced by Sealed Air.

We inform you that Sealed Air does not make routine analysis to individualize the substances in the "Candidate List", and the present declaration is generated based on the information provided by our suppliers.

Therefore, following our best knowledges SVHC are not expected to be present above 0.1% threshold in our products.

A list of Substances of Very High Concern (SVHC) is periodically published by the ECHA - European Chemical Authority -. These substances are subjected to obligations which include information to users when they exceed 0.1% by weight in the finished product.

https://echa.europa.eu/en/candidate-list-table?utm_source=echa-weekly&utm_medium=email&utm_campaign=weekly&utm_content=20220119&cldee=YmFyYmFyYS5wYWNPbmlAc2VhbGVkYWlyLmNvbQ%3d%3d&recipientid=lead-b2927879d886e911810d005056b9310e-716fe3276a704f9b9205abad85609281&esid=d4f14fb4-2d79-ec11-8134-005056b9310e

REACH Regulation ANNEX XIV and ANNEX XVII

In addition, based on knowledge of the manufacturing process, the Substances subject to authorization under EU REACH regulation which are listed in the Annex XIV have not been intentionally added to the protective packaging products produced by Sealed Air. Substances on this list are selected from REACH SVHC list and they cannot be placed on the market or used after a given date ("sunset date"), unless an authorization is granted for their specific use, or the use is exempted from authorization. We inform you that Sealed Air does not make routine analysis to individualize the substances listed in the "Annex XIV", and the present declaration is generated based on the information provided by our suppliers.

Finally, based on knowledge of the manufacturing process, the Substances Restricted under REACH listed in the Annex XVII have not been intentionally added to the protective packaging products produced by Sealed Air. We inform you that Sealed Air does not make routine analysis to individualize the substances listed in the "Annex XVII", and the present declaration is generated based on the information provided by our suppliers.

UK-REACH

On 1st January 2021 UK has activated its independent Registration, Evaluation, and Authorization of Chemicals regime (UK-REACH) as a consequence of Brexit. As for the EU-REACH, the principle of UK-REACH Regulation is 'No data, no market', that means that substances manufactured or imported >1 T/a year into the UK must be registered with the UK Agency, HSE. The UK is no longer covered by EU law and EU chemicals legislation has ceased to apply to UK companies. It is important to point out that all EU REACH registrations held by UK entities became void.

Sealed Air has increased its level of preparedness together with its suppliers, to maintain the continuity of supply of our products to customers in the UK, the EU27 and the rest of the world. By the deadline of 27th October 2021, Sealed Air has submitted to HSE competent authority the Downstream User Import Notification (DUIN) for the substances imported in UK Sealed Air plants over 1 ton/year from suppliers located outside UK.

Sealed Air customers who ship their products using our packaging materials are not likely to be affected by the UK-REACH regulation since the packaging product meets the definition of an “Article” not intended to be released under normal or reasonably foreseeable conditions of use and are exempt from the UK-REACH registration.

RoHS 3 - 2015/863/EU Directive

The RoHS 2 directive - 2011/65/EU – whose the annex II has been amended by the delegated Directive (EU) 2015/863 called RoHS 3 regulates the restriction of the use of certain hazardous substances in electrical and electronic equipment. Nevertheless, we would like to inform you that Sealed Air’s products do not contain any substances that are regulated by the RoHS directives.

None of the ten following substances have been intentionally added to these products during the manufacturing process and would not be expected to be present in amounts greater than the maximum concentration value reported in the Annex II “*Restricted substances referred to in Article 4(1) and maximum concentration values tolerated by weight in homogeneous materials*” of the Directive (EU) 2015/863:

Restricted Substance	Maximum Concentration Value
Lead (Pb):	0.1% by weight (1000 ppm)
Mercury (Hg):	0.1% by weight (1000 ppm)
Cadmium (Cd):	0.01% by weight (100 ppm)
Hexavalent Chromium: (Cr VI)	0.1% by weight (1000 ppm)
Polybrominated Biphenyls (PBB):	0.1% by weight (1000 ppm)
Polybrominated Diphenyl Ethers (PBDE):	0.1% by weight (1000 ppm)
Bis(2-Ethylhexyl) phthalate (DEHP):	0.1% by weight (1000 ppm)
Benzyl butyl phthalate (BBP):	0.1% by weight (1000 ppm)
Dibutyl phthalate (DBP):	0.1% by weight (1000 ppm)
Diisobutyl phthalate (DIBP):	0.1% by weight (1000 ppm)

Packaging & Packaging Waste Directive

PRODUCT CARE foam materials fulfil the requirements in the European Directive 94/62/EC of December 20th, 1994 on packaging and packaging waste, and subsequent amendments. Measures to minimize use of resources - materials and energy - while maintaining high products performances have been adopted during the whole phase of the design and manufacturing of our products.

All our products fulfil the relevant CEN norms and comply with the essentials requirements which are:

- Prevention by source reduction (EN 13428)
- Recovery by energy (EN 13431)
- Material recycling (EN13430)
- Re Use (EN 13429)
- Minimization of dangerous and hazardous substances
- Heavy metal content: less than 100 ppm

Persistent Organic Pollutants

Our products comply with the Regulation (EU) No 1021/2019 of the European parliament and of the Council of 20 June 2019 on persistent organic pollutants, which abrogates and replaces the Regulation (EC) No 850/2004.

The prohibited substances, as constituents of articles, listed on the Annex I, are, according our information, not expected to be present or intentionally added to any package or packaging component during the manufacturing process:

ANNEX I

Part A — Substances listed in the Convention and in the Protocol as well as substances listed only in the Convention

Substance	EC No.
Tetrabromodiphenyl ether	254-787-2 and others
Pentabromodiphenyl ether	251-084-2 and others
Hexabromodiphenyl ether	253-058-6 and others
Heptabromodiphenyl ether	273-031-2 and others
Bis(pentabromophenyl) ether (decabromodiphenyl ether; decaBDE)	214-604-9
Perfluorooctane sulfonic acid and its derivatives (PFOS)	217-179-8 220-527-1 249-644-6 249-415-0 274-460-8 260-375-3 223-980-3 250-665-8 216-887-4 246-262-1 206-200-6 and others
DDT (1,1,1-trichloro-2,2-bis(4- chlorophenyl)ethane)	200-024-3
Chlordane	200-349-0
Hexachlorocyclohexanes, including lindane	200-401-2 206-270-8 206-271-3 210-168-9
Dieldrin	200-484-5
Endrin	200-775-7
Heptachlor	200-962-3
Endosulfan	204-079-4
Hexachlorobenzene	200-273-9
Chlordecone	205-601-3
Aldrin	206-215-8
Pentachlorobenzene	210-172-5
Polychlorinated Biphenyls (PCB)	215-648-1 and others
Mirex	219-196-6
Toxaphene	232-283-3
Hexabromobiphenyl	252-994-2

Hexabromocyclododecane	247-148-4 221-695-9
Hexachlorobutadiene	201-765-5
Pentachlorophenol and its salts and esters	201-778-6 and others
Polychlorinated naphthalenes	274-864-4 and others
Alkanes C10-C13, chloro (short-chain chlorinated paraffins) (SCCPs)	287-476-5
Perfluorooctanoic acid (PFOA), its salts and PFOA-related compounds	206-397-9 and others
Dicofol	204-082-0

Ozone Depleting Substances - Montreal Protocol

We hereby declare that our Product Care Packaging and Construction PE foams do not contain any Groups ozone depleting substances including CFC, HCFC and HFC. These substances are not used in our production plants.

They comply with the Regulation (EC) No 1005/2009 of the European parliament and of the Council of 16 September 2009 on substances that deplete the ozone layer.

The blowing agent - Hydrocarbon gases - used in the production of our Polyethylene Foams have a **GWP** Global Warming Potential of 3. and an **ODP** Ozone Depletion Potential of 0. This information can be found on chemical literature.

Fluorinated greenhouse gases

Our products comply with regulation (EU) N° 517/2014 of the European parliament and of the Council of 16 April 2014 on fluorinated greenhouse gases and repealing Regulation (EC) No 842/2006.

We do not used in our processes and plants, notably:

- Hydrofluorcarbone - HFC
- Perfluorcarbone - PFC

SUBSTANCES OF CONCERN TO OUR CUSTOMERS

Allergenic Substances

Sealed Air PRODUCT CARE materials do not contain any substances - such as nuts, milk proteins, natural rubber and other relevant substances - neither of natural nor synthetic origin, that are regulated by the 2007/68/EC amending Annex III a to Directive 2000/13/EC.

Animal Derived Substances

We are not intentionally adding substances from animal origin to our packaging materials. Our manufacturing process does not employ components derived from an animal source. Based on this we expect that our products are free of the causative agent of Bovine Spongiform Encephalopathy - BSE -.

Bisphenol A / Bisphenol S

We, SEALED AIR, do not intentionally add BPA and BPS in our formulations. Bisphenol-A (2,2-bis(4-hydroxyphenyl) propane) is a substance used as monomer in the production of Polycarbonate. Bisphenol-A may also be used as constituent of thermo-set coatings of metal cans. BPS is a plasticizer used in order to replace BPA and also as reagent in some glues.

Heavy Metals

The combined level of heavy metals Mercury, Cadmium, Lead and Chromium VI does not exceed 100 ppm in our products, as required by the European Directive 94/62/EC - see the section "Packaging & Packaging Waste Directive".

Phthalic Acid Plasticizers - phthalates -

We, SEALED AIR, declare that phthalates have not been intentionally added to Protective Packaging and Construction products. SEALED AIR proactively discontinued the intentional use of Phthalic Acid plasticizers in its products and inks formulations in 1993.

The term Phthalates identifies a much broader family of substances, used as plasticizers primarily in polyvinyl chloride industry to increase flexibility, transparency, durability, and longevity of plastics. These substances are being phased out as plasticizers of many products in the United States, Canada, and European Union due to legal provisions and growing environmental awareness.

Natural Rubber - latex-

Natural rubber is not intentionally added to products currently sold by SEALED AIR. Natural rubber is known to cause allergenic reactions and contact dermatitis in predisposed people.

Other Substances

PRODUCT CARE packaging and construction products are manufactured in accordance to the relevant laws or recommendations applicable to them.

The substances listed below are not intentionally added to our products. This list is not exhaustive.

- PVC and derivatives
- Asbestos
- Arsenic
- Pentachlorophenol
- Organic tin compounds
- Short-chain paraffin chloride (C10-13)
- Formaldehyde
- Perfluoro-octane-sulfonic acid and its salts
- Benzotriazole and derivatives
- Dimethylfumarate
- Phthalates
- Azo dye and pigment forming specified amines
- Polynaphthalene chloride
- Silicon
- Di-O-Tolyl Guanidine - DOTG
- Perfluorooctanoic Acid - PFOA - and its salts
- Nonylphenol and nonylphenol ethoxylate
- Halogens: fluorine, chlorine, bromine, iodine and astatine .

OTHER

Chemistry Policies

SEALED AIR is well aware of its responsibilities as packaging producer intended to pack otherwise food, articles among other things, as employer and as a company which must and wants to respect our environment. Due to this fact, SEALED AIR wants to minimize the risks for its customers, the consumers, its employees, and our environment.

Taking all this into account, we implemented chemistry policies we want to highlight to our customers and share.

The first action done in this important matter was the replacement of the phthalates and its derivatives in our product structures and inks used over our printing process, 20 years ago. This decision was taken, by our European Regulatory Director on the endocrine effects which the scientific community started to highlight - See the section on Phthalates-.

The Sealed Air Sustainability Advisory Team worked with R&D and Legal departments and created the RCP, Responsible Chemistry Policy. The RCP formalizes Sealed Air's proactive approach to materials that are on the radar screen of regulators, customers, and environmental groups.

This latter sets prohibitions and restrictions on chemicals with environmental, health, safety and regulatory concerns.

The RCP categorizes materials into four lists:

- Banned List: Material prohibited from purchase and use

- Phase Out List: Material currently used in products, but no new products allowed
- Risk Management List: Material currently used in products, but use is restricted
- Watch List: Material flagged due to legislative, customer, NGO, or regulatory issue, which may affect use

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For further information please contact : regulatory@sealedair.com

All statements or recommendations are based on data and knowledge considered to be true and accurate at the time of printing but should be verified by the user. Since the conditions of use are beyond our control, we do not warrant the completeness or suitability for any intended purpose of any statement or recommendation, or the results to be obtained. Please read all statements or recommendations in conjunction with our conditions of sale including those limiting warranties and remedies which apply to all goods and services supplied by us. National or local legal requirements relating to health & safety at work and the protection of the environment shall be applicable in all cases.