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DECLARATION OF COMPLIANCE FOR GRANIC 282

REACH/ SVHC

EC-PACKAGING DIRECTIVE AND CONEG

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## EUROPEAN REGULATION CONCERNING SUBSTANCES WITH VERY HIGH CONCERN (REACH/SVHC)

GCR Group is pleased to announce that it has made all necessary actions to comply with this regulation, as well aware of Reach 1907/2006.

Granic products are manufactured with registered raw materials. Our suppliers are committed to comply in every respect to the requirements of Reach and relevant amendments. So we make sure that they have registered their products. In consequence, we guarantee the absolute continuity of the above product supply.

Furthermore, this product does not contain, to our current knowledge and according with our raw material certificates, any substances listed in “Candidate List” above 0,1%:

(<https://echa.europa.eu/candidate-list-table>).

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## EC-PACKAGING DIRECTIVE AND CONEG (Coalition of Northeastern Governors - USA)

Based on the available documentation from raw materials suppliers, GCR Group confirms that this product complies with the European Parliament and Council Directive 94/62/EC of the 20/12/1994 (as amended by 2004/12/EC, 2005/20/EC and (EC) 219/2009) concerning the defined limit(s) of heavy metals like lead, cadmium, mercury and chromium (VI).

Furthermore GCR Group informs that this product complies with Coalition of Northeastern Governors (CONEG) as the Sum of heavy metals (Cadmium, Lead, chrome and mercury) is <100 ppm.

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## DUAL USE ADDITIVES

According to certificates from our suppliers, GCR Group informs you that the mineral used as a raw material of the above mentioned product can be considered as food additive.

Furthermore, according to our suppliers, the following dual use additives according to EU Regulation 10/2011 are used in the manufacturing process of the raw materials belonging to the above mentioned product:

E 470a: Calcium salts of fatty acids

This statement is according to the “Union Guidelines on Regulation (EU) No 10/2011 on plastic materials and articles intended to come into contact with food” dated 21/02/2014 “to be considered as a dual-use additive it is sufficient that the chemical identity of the plastic additive matches that of an authorized food additive (...) regardless of its purity or whether or not the substance is subject to a restriction in food and/or in the plastic” (§3.6.3).

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### NANOPARTICLES

Nanoparticles with a diameter below 100 nanometers are not intentionally introduced in the manufacturing of the product above mentioned, so their presence in this product is not expected.

However, since we do not perform specific tests to verify the potential presence of nanoparticles in our product, we cannot guarantee that there is no trace amount of some of nanoparticles as impurity or otherwise in this Granic product.

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### ABSENCE OF PARABENS

This grade, to the best of our knowledge, is not intentionally manufactured or formulated with parabens, so is not expected to be present in our product.

However, since we do not systematically perform specific test to verify the potential presence of these substances in our product, we cannot guarantee that there is no trace amount of these substances, as impurity or otherwise, in the above-mentioned product.

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### ABSENCE OF ALKYL PHENOLS

Alky phenols are not used in our manufacturing process.

However, some of our suppliers inform us that one or more of the stabilizers used in the antioxidant package of some of our raw materials is or are in a broader sense alkyl phenols. However they do not belong to the group of estrogen mimicks specified e.g. by the Japanese Authorities.

Some components of the antioxidant package used in these raw materials are either sterically hindered phenols or derived from sterically hindered phenols, e.g. phenols which are substituted in positions 2 and 6 or 2 and 4, with respect to the hydroxyl group.

Such compounds are known to lack estrogenic activity in contrast to alkylphenols such as 4-alkyl-phenols.

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### FOOD ALLERGENS

According to the suppliers, the food ingredients listed in Annex II of Regulation (EU) No 1169/2011, are not used in the manufacture of or formulation of the raw materials belonging to this product. However, this product has not been tested for these substances.

### GENETICALLY MODIFIED ORGANISMS

All raw materials used to manufacture this product have been certified as no Genetically Modified Organisms (GMO).

This information is given in good faith based on available sources at the time of issuing.

### EU-Directive 2011/65/EU the restriction of the use of certain hazardous substances (RoHS)

According to certificates from our suppliers, GCR Group informs you, that the above mentioned product complies with the requirements of the **Directive 2011/65/EU**, as amended, concerning the limits of the following substances referred to in Article 4 (part 1) and maximum concentration values tolerated by weight in homogeneous materials.

Substances	Limits
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 (PBDE)	0.1 %
Bis(2-Ethylhexyl) phthalate (DEHP)	0.1 %
Benzyl butyl phthalate (BBP)	0.1 %
Dibutyl phthalate (BBP)	0.1 %
Diisobutyl phthalate (DIBP)	0.1 %

## EU Directive 2012/19/EU on Waste Electrical and Electronic Equipment (WEEE)

GCR Group informs you, according to our suppliers, that no products listed in the annex VII of this directive enters voluntarily in the composition of our products. Heavy metals are native of quarry and they are present as naturally occurring components of the mineral in the above mentioned product.

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## SAFETY OF TOYS

GCR Group informs you, according to our suppliers, that the above mentioned product is in compliance with the Directive **2009/48/EC** of 18 June 2009 on the safety of toys and subsequent amendments.

This text doesn't apply to our product nevertheless according to our suppliers and the annex II part III - chemical properties, our product:

- Is not a hazardous substance or mixture according the Regulation 1272/2008/EC (CLP)
- Is not a CMR of category 1A, 1B or 2 under CLP
- Neither nitrosamines nor nitrosable substances are intentionally added
- No allergenic fragrance listed in the point 11 of annex II are intentionally added

Concerning Nitrosamine, nitrosable substances and allergenic fragrance: the above Granic product has not been tested for these chemical substances as they are not expected to be present in our product.

## Standard EN 71, Part 3: Soluble elements: migration of certain elements

In agreement with our suppliers and in compliance with the point 13 of annex III and the European standard **EN 71, Part 3: Migration of certain elements**, heavy metal compounds are natural impurities of the mineral content in the above mentioned Granic product. They are not added as intentional ingredients in our product.

According to certificates from our suppliers, (trace elements of the HCL / HNO<sub>3</sub> soluble part) done for some elements show results below the limits mentioned in the Category III - in scraped of toy material but not all listed elements have been analysed (aluminium, boron, chrome III and VI, organic tin).

Please note that the thresholds of migration limits listed in the EN71-3 concerns the toys material or components of toys, not the single product stated above. Since we do not produce the final product, this statement does not remove the obligation of the manufacturer to evaluate/test the toy material or toy components under the above mentioned standard.

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### VOLATILE ORGANIC COMPOUNDS

The content in VOC of above mentioned product is < 3% (mass).

Therefore, this product is exempted from the tax of incentive on the VOC according to the Federal Department of the Swiss Finances DFF.

This evaluation is based on information provided by our suppliers in reference to the presence of volatile organic compounds. Therefore, we do not perform specific tests to verify this.

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### ANIMAL DERIVED COMPONENTS

According to certificates from our suppliers, GCR Group informs you, that some additive(s)/substance(s), of above mentioned product can be synthesized from animal and/or vegetable extracts.

These substances comply with the requirements specified in the "Note for Guidance on minimizing the risk of transmitting animal spongiform encephalopathy agents via human and veterinary medicinal products" (EMA/410/01 Rev.3 - July 1, 2011), adopted by the European Commission and published in the Official Journal of the European Union March, 5, 2011 (2011/C 73/01).

Furthermore, only Category 3 materials or equivalent as defined by Article 10 of European Parliament and Council Regulation (EC) No 1069/2009 are used for these substances and therefore are considered compliant with the EMA Note for Guidance referenced above.

### CONFLICT MINERALS (Dodd-Frank Wall Street Reform and Consumer Protection Act)

This product, to the best of our knowledge, is not intentionally manufactured or formulated with conflict minerals (tin, tungsten, tantalum and gold) as they are defined in the Dodd-Frank Wall Street Reform and Consumer Protection Act.

Furthermore, none of the raw materials belonging to this product have been imported from the Democratic Republic of the Congo (DRC) or adjoining countries as Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

This document expires one year after the date of issue or if an update occurs sooner.

REGULATORY AFFAIRS DEPARTMENT  
Silvia Larrucea

Date 4<sup>th</sup> February 2022