January 2025

Subject: EU REACH Frequently Asked Questions

Dear Flexsys customer,

Flexsys has published this EU REACH FAQ document to answer EU REACH related customer questions. Please find below more detailed information about Flexsys' position with regards to EU REACH.

1. Are substances that Flexsys produces, sells, or imports in the EU registered?

Flexsys confirms all substances that it currently manufacturers in or imports into the EU are registered unless registration is not required. However, consistent with our typical business practices, Flexsys' product portfolio is always subject to review and change.

2. Where can I find information about Flexsys' registered substances?

Substances:
EU REACH registration numbers for substances are published in the EU Safety Data Sheets (SDS) of the registered product. SDS's can be found on the specific product page via www.Flexsys.com or obtained via your Flexsys Sales Representative.

Polymers:
Polymers are exempt from registration according to EU REACH Article 2.9. For this reason, you will not find a registration number or eSDS with exposure scenarios in the annex. However, REACH dictates that the monomer(s) of the polymer need to be registered. Flexsys confirms all monomers used in the manufacturing of its polymers are either registered or exempt from registration.

Mixtures:
Mixtures are exempt from registration. However, substances in the mixture must be registered unless exempt from registration. Flexsys confirms that all substances used in the manufacturing of its mixtures are either registered or exempt from registration.

3. Can Flexsys provide an EU REACH statement for specific products supplied?

As noted above, Flexsys (or its supplier(s)) has obtained the relevant EU REACH registrations to be able to supply its products as REACH compliant. If the products you purchase are supplied by a Flexsys EU legal entity, you are considered a downstream user under EU REACH and can expect that Flexsys has fulfilled its REACH obligations. As a result, Flexsys does not provide separate product-specific statements regarding EU REACH compliance.

Please keep in mind, that if you are supplied with substances from Flexsys, the EU REACH registration number is available on the EU SDS. As the SDS is the primary communication tool under EU REACH this is a statement by itself.

4. What are EU REACH obligations for Flexsys' customers located outside the EU who export to the EU?

The importer into the EU has the obligation to register each imported substance. If the import contains a polymer, its polymer building blocks will need to be registered (i.e., usually the monomers).

Customers residing outside the EU cannot register because registration is only possible for EU-based legal entities. However, a non-EU-based manufacturer can establish an EU-based "Only Representative" (OR) in accordance with EU REACH Article 8(3) to carry out its EU REACH registration obligations.

Although Flexsys has registered, where applicable, the substances manufactured by its legal entities inside and outside the EU, this only covers the substances manufactured by Flexsys in the EU or imported by Flexsys into the EU. Products purchased from Flexsys outside the EU and subsequently exported into the EU (i.e., indirect imports) will not be accounted for in Flexsys' substance registrations. Non-EU customers of Flexsys products who ultimately export these products to the EU will need to take steps to ensure that products imported into the EU are EU REACH compliant (e.g. register the substances through an OR, verify that their importers have registered or request OR coverage from Flexsys).

5. Who should I contact at Flexsys with my REACH questions?

The best way to contact Flexsys is via your normal Flexsys Sales Representative.

It is important that you the reader, and the company you represent, make your own independent evaluation of any information, materials, recommendations, or advice ("Information") provided herein. You must make your own determination of the suitability and completeness of the information for your own use, protection of the environment, and the health and safety of your employees and purchasers of your products.