

# CHEMICAL COMPLIANCE STATEMENT.

COMMITMENT – Trimco Group is committed to global regulatory requirements of chemical compliance.

# TRIMCO GROUP'S CHEMICAL COMPLIANCE STATEMENT.

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Trimco Group is a global label and packaging supplier of the following categories of products:

- / Woven labels
- / Printed labels
- / Care labels
- / Badges/buttons (PU, TPU, silicone)
- / Badges/buttons (Metal)
- / Packaging materials (paper) - hangtag, hanger, sticker, tissue paper, bags, boxes, etc.
- / Packaging materials (plastic) - seal, polybag, bags other than polybag, etc.
- / Packaging materials (textile) - string, bag, suit cover, etc.

Trimco Group's chemical governance includes an annual review of:

- / Trimco Group chemical management policy and procedures
- / Trimco Group RSL
- / Trimco Group QCC SOP chemical testing

The Trimco Group chemical compliance team keeps

track of updates to chemical regulations and limits that affect the product categories we supply via our third-party testing bureau, lab-testing webinars, seminars and training programs.

The Trimco Group chemical compliance team updates the Trimco Group RSL and chemical management policy and procedures based on regulatory demands as well as industrial requirements, including the requirements from our customers.

Trimco Group has a due-diligence procedure to ensure compliance. This includes updating the Trimco Group RSL to cover all these requirements, distribute the RSL to our production sites, and sub-suppliers - with mandatory training programs. We have a regular third-party testing plan in place to ensure compliance for each of our product categories.

**PFAS**

PFAS are not present in any of Trimco Group's product categories because we do not intentionally use them in our production.

PFAS (per- and polyfluoroalkyl substances) are used in textiles primarily as durable coatings to repel water, oil, and stains, particularly in outdoor gear, performance apparel, upholstery, and carpets. Trimco Group does not use such substances in its production, as we do not offer any such "durable function" on our product categories. Trimco Group selects products from each category to test for PFAS annually. Trimco Group can provide PFAS test results for the 'care label' category, which covers the materials and inks used in that category - applicable to all 'care labels'.

**PFAS and recycled paper**

PFAS may be present in recycled papers due to the nature of input materials in the recycled paper industry. Trimco Group has no control over the input materials. When using recycled paper – a brand may wish to include extra PFAS testing on their paper batches.

**PFAS and recycled polyester yarn  
(fiber-to-fiber vs PET)**

PFAS may be present in recycled polyester yarns that are developed from fiber-to-fiber materials. The reason is the nature of input materials in the recycled fiber-to-fiber industry. Trimco Group has no control over the input materials in the fiber-to-fiber industry. When using fiber-to-fiber recycled polyester – a brand may wish to include extra PFAS testing on their batches.

Trimco Group's recycled polyester yarns originate almost solely from PET bottles. PET bottles do not contain PFAS. If a brand chooses a fiber-to-fiber recycled polyester, more testing is recommended.

**Chemical requirements under PPWR**

*How will the PPWR deal with the addition of substances of concern (SoC) and the use of recyclates?*

The objective of the Regulation is the minimization of the presence of SoC in packaging. This will be done via the identification of substances of concern, as a first step, and their limitation, if they are relevant for recycling, via the DfR criteria, to be adopted under Article 6(4) PPWR, or via the update of REACH restrictions for substances that affect human health or the environment.

According to Directorate-General for Environment; Packaging and Packaging Waste Regulation (PPWR) 2026: The identification of the relevant substances is on-going via a study led by the Commission and the European Chemicals Agency (ECHA).

Once the details of this chemical restriction are known, Trimco Group will conduct studies and testing to ensure its packaging products comply with these restrictions.



**Trimco Group's products comply with the following regulations**

This is a non-exhaustive list.

- / Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)
- / Regulation (EU) 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants (POPs)
- / Décret n° 2025-1376 du 28 décembre 2025 relatif à la prévention des risques résultant de l'exposition aux substances perfluoroalkylées et polyfluoroalkylées (French Decree No. 2025 1376)
- / California Assembly Bill No. 1817 Product safety: textile articles: perfluoroalkyl and polyfluoroalkyl substances (PFAS)
- / California Proposition 65
- / Model Toxics in Packaging Legislation
- / Toxic Substances Control Act (TSCA)
- / Canadian Environmental Protection Act (CEPA)
- / Bekendtgørelse om forbud mod import og salg til forbrugere af beklædning, fodtøj og visse imprægneringsmidler, der indeholder PFAS
- / LOI n° 2025-188 du 27 février 2025 visant à protéger la population des risques liés aux substances perfluoroalkylées et polyfluoroalkylées (1)

**Annex available upon request**

Trimco Group chemical management policy and procedures

/ Trimco Group RSL

/ Trimco Group QCC SOP chemical testing

Please do not hesitate to contact us, should you have any questions or require further information: [trimco-group.com](https://www.trimco-group.com)