

## Hazardous Chemical Management Policy

### Document objective

The purpose of this policy is to set the foundations to avoid, minimize or mitigate possible impact on the environment, by establishing Gurit commitments towards the management of chemicals within its operation. The Hazardous Chemical Management Policy is a complement to Gurit's Environmental policy and the Group's Sustainability Policy. This policy is also a part of Gurit's commitments as supporter of United Nations Global Compact and its Environmental principles.

This Hazardous Chemical Management Policy applies to all companies that are part of Gurit Group.

### Related documents: publicly available on [www.gurit.com/sustainability](http://www.gurit.com/sustainability)

- [Gurit Code of Conduct](#)
- [Gurit Sustainability Policy](#)
- [Gurit Environmental Policy](#)
- [Gurit Water Management Guidelines](#)

### Document index

|   |        |
|---|--------|
| Section 1 – Introduction and Scope  | page 2 |
| Section 2 – Policy <ul style="list-style-type: none"><li>a) Chemical Hazard Quantification<ul style="list-style-type: none"><li>(i) High Priority Chemical Score</li><li>(ii) ILO Risk Rating</li></ul></li><li>b) Chemical Substitution</li><li>c) Policy Principles</li></ul> | page 3 |
| Section 3 – Setting Targets and Communication   | page 8 |
| Section 4 – Review, Stakeholder Feedback and Reporting Concerns   | page 8 |
| Section 5 – Appendix: Glossary of acronyms  | page 9 |

## 1 – Introduction and Scope

Gurit produces many product types varying from formulated laminating systems, adhesives, core materials, prepregs, pultruded structural profiles, tooling, manufacturing solutions, core kitting and structural engineering services. Many different chemicals are used during the manufacture process of these products some of which form the basis of the products. As the chemical constituents vary greatly so do the hazards associated with them. As well as performance of our products Gurit identifies and manages the risks to human health and the environment that form part of the characteristics of the chemicals and products we use and manufacture. We certify our production sites with the ISO 14001:2015 Management System and as a supporter of the United Nations Global Compact (UNGC) we commit to sustainable practises and products and align them with the UN Sustainable Development Goals (SDG) and report annually according to the GRI standard. By considering the principles of the policy, negative health and safety outcomes of Gurit's customers and employees is reduced as far as reasonably practical.

Due to the varying applications and types of chemical product use two systems are used to quantify chemical product hazards. An internal HPC score is assigned to finished products that are classified as hazardous. The HPC score encompasses human health, environmental and regulatory concerns of products sold by Gurit. The International Labour Organisation (ILO) Risk rating is used to quantify risks of handling chemical products during manufacture. At Gurit, during operations ILO risk rating is used for risk assessment and HPC score is used to drive product development and product lifecycle decisions.

Gurit complies with the many legal requirements that have been introduced to international legislation over the years to protect people and the environment from the potential adverse effects of exposure to hazardous chemicals. The advances in analytical techniques and hazard testing mean that the detection of harmful substances is more accurate, and the volume of hazard data generated is greater. These aspects contribute to a growing and ever-changing chemical hazard picture. New forms of chemical regulation are developed and applied on an ongoing basis. In addition to the development of new chemical legislation, compliance with schemes such as the Stockholm Convention, Rotterdam Convention and conflict mineral legislation is widely adopted and compliance with these is of great importance.

These requirements have led to developments in governmental chemicals policy ranging from EU Registration, Evaluation and Authorisation of Chemicals Regulation (REACH), US TSCA and China's Decree 591; Regulations on Safe Management of Hazardous Chemicals in China to name a few. The development of such regulations to control the most harmful chemicals coupled with the advent of **GHS (Globally Harmonised System)** which has or is in the process of being adopted by the majority of UN countries. This harmonization benefits all users of chemicals providing better access to chemical hazard information and potential restrictions around chemical usage, ultimately allowing for better management of the risks.

### Scope

Within scope are all chemical products handled and purchased at all Gurit Group sites. These may be chemicals used as raw materials in production of other products, chemical products used in the maintenance of production facilities or chemical products used in Gurit's offices. Out of scope is data that may be generated through LCA analysis such as human toxicity CO<sub>2</sub> equivalent data. Such specific data is covered by Safe and Sustainable by Design principles.

## 2 – Policy

### (a) Quantifying Chemical Hazards

To determine the level of hazard and set targets, two methods for quantifying hazardous data are used.

#### (i) High Priority Chemical Score

Whilst Gurit recognises that hazardous chemicals must be used in order to produce quality products we also understand that these must be used with knowledge of the risk they present to human health and the environment. It is expected with the continual growth of available hazard data due to regulations such as REACH that the number of chemicals identified as requiring legislative restrictions will increase. The tracking of such factors within Gurit means that the increase in harmful chemicals can be managed effectively and maintained at a practicable level. Central to managing the risk of our products is the identification of “high priority chemicals”. These are identified within Gurit as having one or more of the characteristics below:

- Carcinogens, Mutagens and Reproductive toxic chemicals (CMRs)
- Persistent bio accumulative toxic chemicals (PBTs)
- Very Persistent Bio-accumulative toxic chemicals (vPvBs)
- Persistent Mobile Toxic chemicals (PMTs)
- Very Persistent Mobile Toxic chemicals (vPMTs)
- Ozone depleting chemicals
- Endocrine disruptors
- High toxicity chemicals

To identify high priority chemicals an in-house score (HPC Score) is assigned to all chemical raw materials and to all Gurit materials. Many systems for ranking and scoring chemical’s human health and environmental impact have been discussed in industry and are used by large manufacturing companies. In identifying a scoring system relevant for Gurit, it was important to understand the aspects that affect Gurit’s suppliers, manufacturing processes and customers whilst ensuring that a meaningful tool was developed for formulators. The HPC score can be applied to substances, raw materials (substances or mixtures) and finished products and highlights the most hazardous and, by association, most at risk from regulatory restrictions, for each product in the formulation process.

As well as identifying hazards such as those outlined above consideration is also given to the substance’s regulatory status within the EU such as classification as an SVHC, authorisations and restrictions that may be placed on the substance. EU REACH has been chosen as the legislation to weight HPC scores due to its regulatory maturity, large industrial influence both outside and within the EU and very often leading the way in hazardous chemicals management in other regions. EU REACH also has a very rigorous process for characterisation of chemical hazards considering data and opinion from industry and member states.

The HPC score is based solely on the regulatory status of the chemical and its hazard and does not consider the commercial sector or product type that the chemical is used in. The score must therefore be considered along with, not independently to these factors. Once scored the chemical is assigned either a red, orange, blue or green status.

- **Red** – Do not use in new formulations, formulate out as soon as technically feasible. (HPC >19)

- **Orange** – Undesirable; can be used if no technically feasible alternative available. (HPC = 9-18)
- **Blue** – Use with caution, some regulatory activity and/or low hazard (HPC = 3-8)
- **Green** – Unrestricted use of the chemical in formulations. (HPC = 0-2)

Assignment of an HPC score allows Gurit to quantitatively identify, control and monitor the use of the most hazardous chemicals to human health and the environment and to target such products for reformulation.

#### **(ii) ILO Risk Rating**

The International Labour Organisation (ILO) risk rating is a method for quantifying the risk a chemical product may pose to the worker based on the ILO Chemical Control Toolkit for workplace chemicals. The ILO Risk Rating uses control banding to focus on exposure controls required to manage the risk. Since it is not possible to assign a specific Occupational Exposure Limit to every chemical in use, a chemical is assigned to a "band" for control measures, based on its hazard classification according to international criteria, the amount of chemical in use, and its volatility/dustiness. Where occupational exposure limits exist for a substance, these are included in any risk evaluation.

The ILO risk rating is calculated on all chemical products used at Gurit premises and is used to determine appropriate exposure controls through chemical risk assessments.

#### **(b) Chemical substitution**

ISO 45001:2018 encompasses the concept of risk reduction and in common with good practice the substitution of hazardous chemicals with less hazardous equivalents is desirable in all operations using such products. Substitution with bio-derived sources is preferable over petroleum-based products and as such are encompassed in the substitution principles where these materials do not conflict with other good sustainability practices.

Before considering the substitution of an existing chemical we must ensure that any replacement fits with the manufacturing process and ensure that any changes do not affect any current certifications or qualifications currently held on the product. Consequently, it is not always feasible to substitute chemicals in many existing products and even if it is possible the cost of making such changes may be prohibitive. As a result, substitution or elimination of hazardous chemicals in formulations tends to be focused on new product development activities.

Gurit recognises the ECHA 'sunset dates' as applied to the most harmful substances subject to authorisation (REACH Annex XIV) and will always comply with such dates. In order to drive the substitution process further concerning the most harmful substances, Gurit generates self-imposed 'horizon dates' on products. These dates are imposed after the phase out period of products containing the most harmful substances where they will no longer be available.

#### **(c) Policy Principles**

The hazardous chemicals management policy is driven by four principal ideas that we believe help to ensure that the products we produce, or use minimise adverse effects to human health and the environment.

- 1) **Assess and avoid "High Priority Chemicals"**: We have adopted a chemicals management approach whereby we aim to either eliminate or minimise exposure when

hazards cannot be prevented with the purpose of minimising exposure to harmful chemicals both within our own operations and for our customers. To that end, we:

- Identify “high priority chemicals” that we currently use.
- Actively assess the feasibility of using alternative, less hazardous chemicals.
- Focus on the development phase of new products to identify when and where these less hazardous chemicals may be used.
- Develop projects designed to eliminate or substitute “high priority chemicals”.
- Replace “high priority chemicals” in our existing products and manufacturing processes, if this is technically and economically feasible.
- Adopt appropriate and responsible risk management approaches where elimination or substitution is not possible.
- Reporting of key performance indicators relating to substitution and reduction in high priority chemicals.

This will be achieved by;

- Each chemical used in Gurit materials will have a HPC (High Priority Chemical) score assigned to it to identify areas of chemical hazard and regulatory concern. It is expected that year on year the number of chemicals classified as red HPC’s will rise as regulation develops and evolves. By monitoring the number of HPC’s used we can ensure we are controlling the increasing regulatory restrictions being placed on chemicals.
- Chemical products used at Gurit sites is assigned an ILO risk rating and appropriate Chemical Risk Assessment is carried out.
- New project activity will focus on health and safety of products as much as technical performance and is written into each project specification. The legislation of the target sales geographies will also be identified in the specification to allow compliance with local legislation.
- Product development projects created specifically to target existing red high priority chemical containing products.
- Identification early in the development process of orange grade high priority chemicals allows the relevant stakeholders of the project to inform and act as appropriate to ensure controls are in place.
- Annual reporting of Gurit HPC chemicals created by regulatory compliance to monitor Gurit’s product position within the hazardous chemicals landscape.

Supporting GRI standards:

- GRI 416: Customer Health and Safety 2016

**2) Hazard Assessment and Communication:** A comprehensive understanding of chemical hazards is critical for decision making and the sound management of risks. We therefore:

- Use assessment approaches that identify the key environmental and workplace health and safety hazards associated with all our chemicals used.
- Obtain environmental and workplace health and safety information on non-proprietary chemicals from our suppliers.
- Provide relevant stakeholders (e.g. employees, contractors, customers, etc) with chemical hazard information to enable them to adopt appropriate risk management approaches.
- Regular review of products and raw materials to identify any opportunity for reformulation to generate lower hazard products for our customers and workers.

This will be achieved by:

- Evaluation of sample chemicals before they are brought into Gurit by way of chemical risk assessment, considering hazards and control measures required such as those described in EU Chemical Agents directive (CAD 98/24/EG) and Carcinogens and Mutagens Directive (CMD 2004/37/EC) and HPC score.
- No sample will be evaluated technically without the appropriate chemical risk assessment in place.
- The hazards of nano-size materials are considered separately to their larger forms due to their unique properties.
- Chemical risk assessments carried out to ILO chemical control kit framework and such assessments available throughout working areas.
- Raw material and product safety datasheets available to all Gurit employees globally.
- Automated sending of Safety Datasheets to all customers upon purchase of product and updates sent automatically, where applicable, to all customers receiving the product in the last 12 months.
- Hazard labelling applied appropriate to the country of destination and to include all relevant languages and in a format specific to that region's legislation.
- All finished product safety datasheets are reviewed at least every two years to ensure the most up to date information is communicated.
- Incoming safety datasheet review process to identify changes to raw materials.
- Tracking of all chemicals used by Gurit for changes to their regulatory landscape. Any changes are assessed for impact on finished products and the products HPC score and acted upon accordingly.

Supporting GRI standards:

- GRI 416: Customer Health and Safety 2016
- GRI 2: General Disclosures 2021. GRI-2-29 Approach to stakeholder engagement

**3) Supply Chain Management:** We recognise we have a role to play in encouraging responsible management of hazardous chemicals throughout our supply chain and apply consistent standards to our supply chain partners. This is achieved by:

- Requiring that our suppliers comply with all legal and regulatory requirements.
- Establishing global environmental, health and safety requirements for key suppliers and where appropriate conduct pre-contract evaluations of potential suppliers.
- Work with suppliers to eliminate high priority chemicals from raw materials wherever technically feasible.
- Availability of all our Safety Datasheets on request to customers as well as automated sending of updates to customers.
- Responsible management of hazardous waste
- Management of emergency response contact for in-house and customer exposure incidents.

This will be achieved by:

- Working with all suppliers of hazardous products to supply compliant, recently reviewed safety datasheets (preferably no more than 2yrs old).
- Ensuring all chemicals used are compliant with relevant legislation such as REACH, conflict minerals and RoHS 2011/65/EU.
- Moral, ethical sourcing.
- Remote audits of suppliers prior to contract agreement.

- Involve suppliers in reformulation work to reduce the number of HPC's where specific projects have been set to achieve improved health and safety.
- Automated sending of Safety Datasheets to all customers upon purchase of product and updates sent automatically where applicable to all customers receiving the product in the last 12 months.
- Hazardous waste disposal process ensuring effective chain of custody as described in Gurit's waste guidelines.
- Emergency telephone response service available 24/7 and available to all customers in case of chemical product exposure incidents and accidents to include full reporting of such incidents.
- All chemical exposure incidents, whether on Gurit Premises or by Customers are recorded in Gurit's Safety Management System and as such receive due consideration including lessons learnt and identification of system and product improvements.

Supporting GRI: standards

- GRI 2: General Disclosures 2021. 2-29: Approach to stakeholder engagement
- GRI 306: Waste 2020; GRI 204: Procurement Practices 2016

**4) Sustainable Chemistry:** We believe that the advancement of sustainable products and green chemistry should occur wherever possible. Therefore, we work to identify opportunities to adopt sustainable chemical technologies wherever feasible:

- Improving process design and efficiency to minimise and reduce associated waste, material consumption or emissions.
- Exploring opportunities for the use of renewable resources and to foster the reuse of materials.
- Minimising energy-intensive manufacturing processes.
- Exploring and optimising recycling and reuse opportunities.
- Explore innovations in sustainable technologies.
- Work with suppliers to improve sustainable supply chains.

This will be achieved by:

- Optimisation of manufacturing times to ensure minimal energy consumption.
- Creating projects specifically targeted at reducing energy and waste in manufacturing processes and incorporating recyclables in new products.
- Actively seeking greener sourced chemicals.
- Supplier evaluations through sustainability questionnaires and SEDEX supplier evaluation, including targeted questions on sustainable product developments and LCA.
- Participation in collaborative projects to confront the sustainability issues inherent in certain chemistries.

Supporting GRI standards:

- GRI 301: Materials 2016
- GRI 302: Energy 2016



### 3 – Setting targets and Communication


Gurit sets targets regarding its use of hazardous chemicals and reviews them annually as part of its Sustainability strategy. Targets and progress towards these targets are reported annually in the Corporate Sustainability Report.

Product specific information and Safety Datasheets are available on Gurit's website and on the Product Stewardship page at: [www.gurit.com/product-stewardship/](http://www.gurit.com/product-stewardship/)

The latest version of this policy is published on Gurit's Sustainability web page at [www.gurit.com/policies/](http://www.gurit.com/policies/)

### 4 – Review, Stakeholder Feedback and Reporting Concerns

This policy will be reviewed every 24 months or as is appropriate by the Chemical Regulatory Compliance department. Stakeholders are encouraged to share concerns, complaints, questions or observations with the Global Sustainability Team via e-mail to: [sustainability@gurit.com](mailto:sustainability@gurit.com). Stakeholders may also use the Gurit Group's Report-a-Concern platform available online at: [www.gurit.com/report-a-concern](http://www.gurit.com/report-a-concern)

|                      |   |
|----------------------|---|
| Policy content owner | Amy Moram, Chemical Regulatory Compliance Manager                                   |
| Reviewer             | Paul Spencer, Head of Technology  |
| Approver             | Lance Hill, Member of the Executive Committee                                       |
| Date of approval     | 30 May 2023   |
| Approver signature   |  |
| Date of last review  | 23 August 2023  |



## 5 – Appendix: Glossary of Acronyms

### COSHH

The Control of Substances Hazardous to Health Regulations 2002, as amended is a United Kingdom Statutory Instrument that states general requirements on employers to protect employees and other persons from the hazards of substances used at work by risk assessment, control of exposure, health surveillance and incident planning.

### GHS

The Globally Harmonized System of Classification and Labelling of Chemicals (GHS) is an internationally agreed-upon system, created by the United Nations beginning in 1992 to harmonize the classification and labelling of chemical substances across the globe.

### GRI

Global Reporting Initiative: [www.globalreporting.org/](http://www.globalreporting.org/)

### Gurit Materials

Any product manufactured by Gurit used by a composite processor to manufacture a composite structure. Materials include Formulated products, Pre-preg and Core materials.

### HPC Score

High Priority Chemical Score is a Gurit internal scoring system created to identify the most hazardous chemical substances and formulations used.

### REACH

Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) is a European Union regulation dated 18 December 2006. REACH addresses the production and use of chemical substances, and their potential impacts on both human health and the environment

### RoHS

The Restriction of Hazardous Substances Directive 2002/95/EC, (RoHS 1), short for Directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment, was adopted in February 2003 by the European Union.

### SDG

United Nations Sustainable Development Goals. [www.undp.org/sustainable-development-goals](http://www.undp.org/sustainable-development-goals)

### SVHC

A Substance of Very High Concern (SVHC) is a chemical substance (or part of a group of chemical substances) for which it has been proposed that the use within the European Union be subject to authorization under the REACH Regulation.

### TSCA

The Toxic Substances Control Act (TSCA) is a United States law, passed by the United States Congress in 1976 and administered by the United States Environmental Protection Agency, that regulates the introduction of new or already existing chemicals.

### UNGC

United Nations Global Compact: <https://unglobalcompact.org/>