February 27, 2026

UPM Adhesive Materials compliance statements

These statements are valid for label materials manufactured by UPM Adhesive Materials in EMEIA (hereafter UPM).

UPM actively complies with and anticipates applicable laws and regulations to ensure that its raw materials, semi-finished products and final products are as safe as they can be – for the environment, everyone working in the manufacturing and supply chains and consumers.

UPM views legislative changes and consumer concerns positively, as a continual source of opportunity for the creation of new business and new product solutions.

In this document, UPM has compiled the regulatory and legislative statements of compliance relating to all its label materials manufactured at its European factories.

Contents

Basis of statements

The following statements are based on UPM's knowledge of raw materials and processing used in label materials as well as a review of material safety data sheets and limited supplier surveys. UPM does not routinely test its label materials to confirm the presence or absence of these substances listed. These statements are intended for general guidance and should not be considered as a substitute for customer-specific qualification or regulatory assessments.

Allergens

UPM does not add the following food allergens to its label materials as listed in Annex II of Regulation (EU) No 1169/2011 article 9:

1. Cereals containing gluten
2. Crustaceans
3. Eggs
4. Fish
5. Peanuts
6. Soybeans
7. Milk
8. Nuts
9. Celery
10. Mustard
11. Sesame seeds
12. Sulphur dioxide and sulphites
13. Lupin
14. Molluscs

Please note that Regulation (EU) No 1169/2011 is explicitly for food and ingredients in food and is not concerning food packaging material.

Aromatic amines

Aromatic amines are not used in the manufacture or formulation of UPM's label materials.

Asbestos

Asbestos is not used in the manufacture or formulation of UPM's label materials.

Animal Parts, BSE and TSE, Halal, Kosher and Vegan

UPM does not use animal parts as additives in the manufacture of its label materials.

Further up in UPM's supply chain, some products may contain additives and substances synthesized from animal extracts, such as fatty acids from the hydrolysis of animal fats (tallow).

These animal-sourced raw materials have typically been chemically altered from their original structure and have undergone significant chemical processing; they are therefore considered synthetic.
UPM confirms that all upstream components that may be based on tallow comply Regulation (EC) No 1069/2009 and its amendments governing material that present risks related to Transmissible Spongiform Encephalopathies (TSE) and Bovine Spongiform Encephalopathy (BSE)

UPM products have not been assessed or certified under any Halal, Kosher or Vegan certification systems.

Biocides, Regulation (EU) No 528/2012 (BPR)

The Biocidal Products Regulation (EU) No 528/2012 (BPR) covers both the biocidal products themselves and the treatment of the final article to be placed on the EU market with the intention to still have a biocidal function or property. According to the BPR, a "*treated article*" is an article that is "*treated with, or intentionally incorporates, a biocidal product.*"

The role of UPM and that of its supply chain is to ensure that the active substance supplier (or the product/substance importer) is included in the list referred to in Article 95 of the BPR.

For the adhesives, a small amount of anti-microbial additives may be mixed into some of UPM's raw materials and/or those of other adhesive component suppliers further up in the supply chain to prevent microbial growth during storage or processing. The biocides are only a residue from the production phase and are not intended to still have a biocidal function or property in the finished goods (label materials). Therefore, the adhesive used in UPM's label materials do not classify as "treated articles" and the provisions in the BPR concerning the final article do not apply to these adhesives.

Bisphenol A (BPA), Bisphenol B (BPB) and Bisphenol S (BPS)

Bisphenol A (BPA) and Bisphenol B (BPB) are not intentionally added to any label materials. A limited number of direct thermal products contain Bisphenol S (BPS) that is intentionally added by upstream raw material suppliers as part of the thermal coating formulation. BPS is communicated as a Substance of Very High Concern (SVHC) when present above 0.1 percent weight by weight and remains permitted for non-food applications. Regulation (EU) 2024/3190 will restrict the intentional use of hazardous bisphenols, including BPS, in food-contact thermal coatings from July 20, 2026 and affected thermal products are being transitioned to meet this requirement.

California Safe Drinking Water and Toxic Enforcement Act of 1986 (Prop 65)

The California Safe Drinking Water and Toxic Enforcement Act of 1986, commonly known as Prop 65, is a risk-based regulation that requires a consumer warning for the potential exposure to a listed substance in the state of California. UPM label materials are semi-finished products that are typically used as a component in a packaging. In general, UPM's label materials do not suspect exposures to Prop 65 substances at levels requiring a warning from reasonably anticipated end uses of the products.
Exceptions include certain monomeric PVC products and thermal products containing Bisphenol S, which are listed on UPM's SVHC statement. Prop 65 risk assessments are product-specific and are addressed on a case-by-case basis.

Conflict minerals, Regulation (EU) 2017/821

UPM does not intentionally add tantalum, tin, tungsten or gold from suppliers who use ores sources from the Democratic Republic of Congo or adjoining conflict-affected or high-risk areas. These minerals are not intentionally added in its manufacturing process.

Dimethyl fumarate (DMF)

UPM does not use dimethyl fumarate (DMF; CAS No. 624-49-7) in the manufacture of its label materials, either as a raw material or as an additive.

Epoxy derivatives

EU Regulation (EC) No 1895/2005 on the restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with food, is not applicable to UPM's label materials. The regulation mainly concerns coatings used in cans and metal closures, with restrictions for:

2,2-bis (4-hydroxyphenyl) propane bis (2, 3-epoxypropyl) ether (BADGE; CAS No. 1675-54-3), and some of its derivatives.

Bis (hydroxyphenyl) methane bis (2, 3-epoxypropyl) ethers (BFDGE; CAS No. 39817-09-9), other novolac glycidyl ethers, NOGE.

Formaldehyde

UPM does not intentionally use formaldehyde as a raw material in the manufacture of its label materials either as a raw material or as an additive.

Heavy metal content

European Parliament and Council Directive 94/62/EC and the Toxics in Packaging Clearinghouse (TPCH) formerly affiliated with the Coalition of Northeastern Governors (CONEG, U.S.), prohibit the intentional addition of lead, cadmium, mercury or hexavalent chromium to packaging or packaging components. Furthermore, the sum concentration of these metals due to incidental introduction into packaging or packaging components must not exceed 100 parts per million (ppm).

Third-party laboratory analysis conducted of several UPM's label materials indicate that the sum concentration of these metals is less than 100 ppm.

Typical concentrations found in UPM's label materials are:

- Lead less than 2 ppm
- Cadmium less than 2 ppm
- Mercury less than 2 ppm
- Hexavalent chromium less than 2 ppm

UPM does not intentionally add lead, cadmium, mercury or hexavalent chromium to its label materials and has no reason to suspect that any of its label materials contain a sum concentration of these heavy metals more than 100 ppm.

Minerals and metals of concern

UPM does not intentionally add cobalt, copper, graphite, lithium, mica, or nickel to its label materials as a raw material or additive and has no reason to suspect the presence of these elements, except for trace amounts that are naturally occurring.

Nanomaterials

The European Commission defines nanomaterials in Commission Recommendation 2022/C 229/01. UPM does not expect nanomaterials to be present in its self-adhesive label materials.

Nitrosamines

UPM does not intentionally use nitrosamines in the manufacture of its label materials either as raw materials or as additives.

Oxo-degradable materials

Directive (EU) 2019/904 of June 5, 2019 known as the Single-Use Plastics Directive (SUPD) includes the prohibiting of oxo-degradable plastics being placed on the market (Article 5).

UPM does not intentionally add any oxo-degradable additives to its label materials and has no reason to suspect these substances are present in its label materials.

Ozone-depleting chemicals

UPM does not use any of the ozone-depleting substances listed below in the manufacturing processes at any of its factories. Therefore, UPM has no reason to suspect these substances are present in its label materials.

1,1,1-trichloroethane CAS No. 71-55-6	Bromochloromethane CAS No 74-97-5
Carbon tetrachloride CAS No. 56-23-5	CFCs
Halons	HBFCs
HCFCs	Methyl bromide CAS No. 74-83-9

Packaging waste, European standards EN 13427-13432

These European Norms are designed to provide compliance with various aspects of Directive 94/62/EC on Packaging and Packaging waste.

EN 13427 Packaging – Requirements for the use of European Standards in the field of packaging and packaging waste.
This European standard provides the requirements and procedures for applying the EN13428 - 13432 packaging standards.

EN13428 Packaging – Requirements specific to manufacture and composition – Prevention by source reduction
UPM is continually developing its label materials to minimize packaging and packaging waste by lowering the grammage of its materials. However, this is only possible if the required technical properties of the materials are maintained.
UPM is in conformity with the minimisation requirement in Annex II of Directive 94/62/EC paragraph 1. In accordance with the methodology laid out in CEN/TR 13695-2:2019 Part 2: "Requirements for

measuring and verifying dangerous substances present in packaging, and their release into the environment". UPM has no reason to suspect that any substances or preparations used in the manufacturing process of UPM label materials classified as dangerous to the environment are likely to be released as emissions, ash or leachate.

EN13429 Packaging – Reuse
UPM's label materials are not designed for reuse, but self-adhesive labels can facilitate the reuse of the main packaging and logistics containers that are labelled. Further information is available on request.

EN13430 Packaging – Requirements for packaging recoverable by material recycling
A label usually becomes an integral part of the product to which it is applied. It is therefore important that both the packaging design and choice of label take into account the use of compatible materials for recycling. For specific guidance on labeling packaging and packaging recyclability, please get in touch with your UPM contact person.

EN13431 Packaging – Requirements for packaging recoverable in the form of energy recovery
Label materials can be used as an alternative source of fuel in conjunction with energy recovery. UPM's label materials provide an excellent source of fuel – they have very low levels of heavy metals and have a calorific value in the region of 20MJ/kg with an ash content of approximately 5%.

EN13432 Packaging – Requirements for packaging recoverable through composting and biodegradation – Test scheme and evaluation criteria for the final acceptance of packaging
Composting of the packaging can be considered as an option if prevention, reuse, recycling, or other types of recovery are not possible, and only where suitable home or industrial composting is available. Further information regarding composting and biodegradation is available on request.

Persistent Organic Pollutants (POPS) Regulation (EC) 2019/1021

UPM does not intentionally add any of these substances in Part A of Annex I of Regulation (EC) 2019/1021 (including the amendment to Annex I in Delegated Regulation (EU) 2025/1930) listed below in the manufacturing processes of any of its factories, and therefore, has no reason to suspect these substances to be present in its label materials.

Tetrabromodiphenyl ether	Dieldrin	Mirex
Pentabromodiphenyl ether	Endrin	Toxaphene
Hexabromodiphenyl ether	Heptachlor	Hexabromobiphenyl
Heptabromodiphenyl ether	Endosulfan	Hexabromocyclododecane
decaBDE	Hexachlorobenzene	Hexachlorobutadiene
PFOS & its derivatives	Chlordecone	PCP and its salts and esters
DDT	Aldrin	Polychlorinated naphthalenes
Chlordane	Pentachlorobenzene	SCCPs
Hexachlorocyclohexanes	PCB	PFOA its salts and related compounds
including lindane	Dicofol	PFHxS its salts and related compounds
Methoxychlor	UV-328	Dechlorane Plus

Polyfluoroalkyl substances (PFASs)

UPM does not intentionally add perfluorooctanoic acid (PFOA; CAS No. 335-67-1) or perfluorooctanesulfonic acid (PFOS; CAS No.1763-23-1) or other telomer-based poly fluorinated surfactants in the manufacture of its label materials.

Polycyclic aromatic hydrocarbons (PAHs) Regulation (EU) No 1272/2013

UPM label materials are not designed or intended for direct, prolonged, or for short-term repetitive contact with the human skin or the oral cavity under normal or reasonably foreseeable conditions of use. Therefore, its label materials do not come under the scope of the Regulation (EU) No 1272/2013.

None of the eight listed polycyclic aromatic hydrocarbons (PAHs) are used in the manufacture of UPM label materials,either as an additive or as a raw material:

Benzo[a]pyrene,
Benzo[e]pyrene,
Benzo[a]anthracene,
Chrysen,
Benzo[b]fluoranthene,
Benzo[j]fluoranthene,
Benzo[k]fluoranthene and
Dibenzo[a,h]anthracene,

UPM have no reason to suspect that any of its label materials contain PAHs listed in the regulation above the allowable limits.

Phthalates

UPM confirms that its label materials - excluding certain monomeric PVC products comply with the phthalates listed in Regulation (EC) No 552/2009 (amending REACH Regulation (EC) No 1907/2006, Annex XVII) for use in toys and childcare products and with the U.S. Consumer Product Safety Improvement Act, Section 108, which has the same substances and limits:

Bis (2-ethylhexyl) phthalate	(DEHP)	CAS No. 117-81-7
Dibutyl phthalate	(DBP)	CAS No. 84-74-2
Benzyl butyl phthalate	(BBP)	CAS No. 85-68-7
Di- 'isononyl' phthalate	(DINP)	CAS No. 28553-12-0 and 68515-48-0
Di-'isodecyl' phthalate	(DIDP)	CAS No. 26761-40-0 and 68515-49-1
Di-n-octyl phthalate	(DNOP)	CAS No. 117-84-0

Please note that monomeric PVC products contain DIDP and DINP at levels greater than 0.1%. This is subject to restriction 52 from Annex XVII of REACH.

PVC / PVdC

UPM does not use halogenated organic compounds such as polyvinyl chloride (PVC) and polyvinylidene chloride (PVdC) in the manufacture of its standard label materials, nor are they used or added by any of its raw material suppliers.

Exceptions apply to specialist products that use PVC as a label face material, or filmic products coated with PVdC. These products are clearly identified in either the product name and/or stated on the relevant technical information sheets.

REACH, EU Regulation (EC) No 1907/2006

UPM complies with REACH regulations. Under REACH, label materials are classed as "articles."

UPM continues to meet the notification requirements under Article 7 of REACH for substances of very high concern (SVHC), should any SVHC be present in concentrations greater than 0.1% (w/w). The Candidate List of Substances was last updated on February 4, 2026.

Information regarding SVHC's in UPM label materials products can be found in a separate statement here.

UPM does not intentionally add any substances listed in Annex XVII (List of Restrictions) to its label materials and UPM has no reason to suspect any of these substances are present in the product above allowable regulatory levels, except in certain monomeric PVC products.

- Monomeric PVC Products: These products contain substances listed in the Authorization List of Annex XVII. Specifically, raw material suppliers have reported that these products contain diisodecyl phthalate (DIDP; CAS No. 68515-49-1) and di-isononylphthalate (DINP; CAS No. 28553-12-0), at levels greater than 0.1%, which are subject to restriction 52 from Annex XVII.

REACH, UK

The EU and Great Britain now operate separate REACH legal systems, which are not linked.
UPM continues to meet the notification requirements under UK REACH legislation for substances of very high concern (SVHC) if any are present in concentrations greater than 0.1% (w/w). The UK REACH Candidate List of Substances was last updated on June 25, 2020.

Information regarding UK REACH SVHC's in UPM label materials can be found in a separate statement here.

Recycled materials

The use of recycled content in UPM's label materials is mentioned in the technical information sheets. If no information is provided there (by product name, product description, or other details), the label material is made of virgin materials. UPM's paper materials sold under FSC™ C012530 certificate as FSC Mix Credit may contain wood from FSC-certified forests, recycled material, or controlled wood as defined by FSC. Currently, the recycled fiber content is typically considered non-significant unless explicitly stated in the technical information sheet.

RoHS, Directive 2011/65/EC (including Delegated Directive (EU) 2015/863)

Directive 2011/65/EU (known as RoHS2) adopted on June 8, 2011 and Commission Delegated Directive (EU) 2015/863 (RoHS3) adopted on March 31, 2015 amended Annex II of RoHS Directive and established maximum concentration values for 10 restricted substances in electrical and electronic equipment (EEE) placed on the market in EU member states.

RoHS restricted substances and their maximum allowable concentration values by weight in homogeneous materials include:

- Lead 0.1%
- Mercury 0.1%
- Cadmium 0.01%
- Hexavalent chromium 0.1%
- Polybrominated biphenyls (PBB) 0.1%
- Polybrominated diphenyl ethers (PBDE) 0.1%
- Bis(2-ethylhexyl) phthalate (DEHP) 0.1%
- Benzylbutyl phthalate (BBP) 0.1%
- Dibutyl phthalate (DBP) 0.1%
- Diisobutyl phthalate (DIBP) 0.1%

UPM does not intentionally use RoHS-restricted substances and has no reason to suspect their presence in its label materials above the allowable concentrations.

Timber Regulations, Regulation (EU) No 995/2010

UPM label materials meet the compliance obligations of EU Timber Regulations.

This regulation is designed to combat the trade in and harvesting of illegal timber and prohibits companies from placing illegally harvested timber or timber products on the market.

Under the regulation, companies that first place timber or timber products on the European market are referred to as "operators". Companies that buy or sell timber or timber products already placed on the EU market are referred to as "traders".

UPM acknowledges its role as a "trader" and an "operator" within the EU Timber Regulation and have taken all appropriate actions to comply with its requirements. "Traders" are required to keep basic traceability information, indicating from whom they purchase and to whom they sell their products. As an operator UPM has a Due Diligence System (DDS) in place, which includes all the elements which are outlined in Article 6 of the Regulation.

Toxic Substance Control Act (TSCA)

UPM does not intentionally add the substances of concern listed below to its label materials. Therefore, UPM has no reason to suspect these substances to be present in its label materials.

- Phenol, isopropylated phosphate (3:1) (PIP; CAS No.68937-41-7)
- 2,4,6-Tris(tert-butyl) phenol (TTBP; CAS No. 732-26-3)
- Pentachlorothiophenol (PCTP; CAS No. 133-49-3)
- Decabromodiphenyl ether (DecaBDE; CAS No.1163-19-5)
- Hexachlorobutadiene (HCBD; CAS No. 87-68-3)

General product safety, Regulation (EU) 2023/988

UPM label materials are considered safe products in accordance with article 3 of the materials description given by Regulation (EU) 2023/988 on general product safety, repealing Directive 2001/95/EC.

UPM is a supplier of label materials and according to REACH these materials are classed as articles and therefore do not require Material Safety Data Sheets (MSDS). The European Chemical Agency (ECHA) in its *Guidance on the Compilation of Safety Data Sheets,* Version 3.1 (November 2015) states: "SDSs do not have to be provided for articles" (1. General Introduction 1.1 The Safety Data Sheet).

The CLP Regulation (Classification, Labelling and Packaging) Regulation (EC) No 1272/2008 primarily concerns the labelling and handling of chemicals and mixtures used in the raw materials to manufacture label materials and to a lesser extent, the finished article. Substances classified as carcinogenic, mutagenic or toxic for reproduction (CMR) – category 1A,1B and 2 - as listed in CLP Regulation, are not used in the manufacture of label-stock products intended for food labelling applications, unless those substances or components are already regulated in the Union list of Regulation (EU) No 10/2011).

Summary of changes

Date	***Comment***
January 12, 2021	Addition of a statement regarding Cobalt.
January 12, 2021	Updated to the wording under EN13430.
January 20, 2021	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
February 4, 2021	Addition of a statement regarding the California Safe Drinking Water and Toxic Enforcement Act of 1986.
June 23, 2021	Addition of Bisphenol B.
June 23, 2021	Addition of a statement regarding Nanomaterials.
July 12, 2021	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
January 10, 2022	Updated the wording under EN13429 and EN13432.
January 17, 2022	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
January 27, 2022	Heavy metal content statement has been updated with reference to Toxics in Packaging Clearinghouse (TPCH) which was formerly known as the Coalition of North-eastern Governors' (CONEG, US).
January 27, 2022	Oxo-degradable materials statement has been updated, the deadline for translating the directive into national law has now passed so this section has been removed.

June 14, 2022	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
August 2, 2022	Updated the wording under EN13428.
January 3, 2023	Email address is now productsafety.emeia@upmraflatac .com
January 3, 2023	Changed the location of PFOS statement so it is alphabetical order.
January 3, 2023	Modified the table on for RoHS, format change only.
January 3, 2023	Included a statement on Toxic Substance Control Act (TSCA).
January 17, 2023	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
February 1,2023	Statement now includes the self-adhesive label stock products from INTERCOAT, a division of UPM Raflatac GmbH, but excluding their PVC range.
February 1, 2023	Replaced the statement regarding Perfluorooctane sulfonates (PFOS) with Polyfluoroalkyl substances (PFASs).
February 1, 2023	Reference is now made to UK REACH.
June 26, 2023	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
January 23, 2024	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
January 23, 2024	Reference is made to REGULATION (EU) 2023/988 On general product safety repealing Directive 2001/95/EC.
February 8, 2024	Updated the section on Persistent Organic Pollutants (POPS) Regulation (EC) 2019/1021 including reference to Delegated Regulation (EU) 2023/1608) regarding PFHxS its salts and related compounds.
February 8, 2024	Some minor changes to the wording only in Ozone-depleting chemicals section.
June 28, 2024	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
November 20, 2024	PVC products from INTERCOAT, a division of UPM Raflatac GmbH, are now included in the statement. Changes have been made to the following: California Prop 65: Added information about Thermal products with Bisphenol S and PVC products.

	New statement regarding Mica. PFAS Statement: Updated for FOODGLOSS-FSC (HIT) with short-chain PFASs. Phthalates: Included monomeric PVC products with DIDP and DINP. REACH: Updated with latest Candidate List of Substances. For Annex XVII there are specified exceptions for monomeric PVC products and FOODGLOSS-FSC (HIT). Recycled Materials: Provided more information on recycled content.
November 21, 2024	Modified the REACH statement.
November 22, 2024	Minor formatting changes only.
December 18, 2024	Updated the section on Persistent Organic Pollutants (POPS) Regulation (EC) 2019/1021 including reference to Delegated Regulation (EU) 2024/ 2570 and added Methoxychlor.
December 20, 2024	Correction to the section on Persistent Organic Pollutants (POPS).
January 22, 2025	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
July 4, 2025	Updated the REACH statement with reference to the date when the candidate list of Substances was updated. The biocide statement. New formatting changes including the font and footer and brand name has been updated to UPM Adhesive Materials and some minor changes.
July 10, 2025	Minor changes to the formatting.
August 2, 2025	Updated the section on Persistent Organic Pollutants (POPS) Regulation (EC) 2019/1021 including reference to Delegated Regulation (EU) 2025/843 and added UV-328. Minor changes to the wording and formatting throughout the document.
September 11, 2025	New section on Minerals and metals of concern. Removing of Cobalt and mica as they are now covered with this new section.
October 16, 2025	Updated the section on Persistent Organic Pollutants (POPS) Regulation (EC) 2019/1021 including reference to Delegated Regulation (EU) 2025/1930 and added Dechlorane Plus.
November 5, 2025	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.

December 8, 2025	Added a new introductory section titled Basis of Statements to clarify the source and limitations of compliance information. Added new section on Nitrosamines. Expanded Animal Parts section to include Halal, Kosher, and Vegan certification status. Updated PFAS and REACH sections as short-chain PFAS are no longer present in FOODGLOSS-FSC (HIT).
February 4, 2026	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
February 6, 2026	Minor changes to the formatting.
February 16, 2026	Updated nanomaterial definition to reflect Commission Recommendation 2022/C 229/01, which updates and replaces the 2011/696/EU definition.
February 27, 2026	Updated the Bisphenol statement to reflect changes in EU food-contact legislation.