	RSL Team	Policy number 005	Approved date: June 1 <sup>st</sup> , 2026
	PrimeAsia Restricted Substance Policy for Suppliers		Effective Date: July, 1 <sup>st</sup> 2026

Updates from our 2025 policy: Incorporation of deforestation due diligence, pg. 3

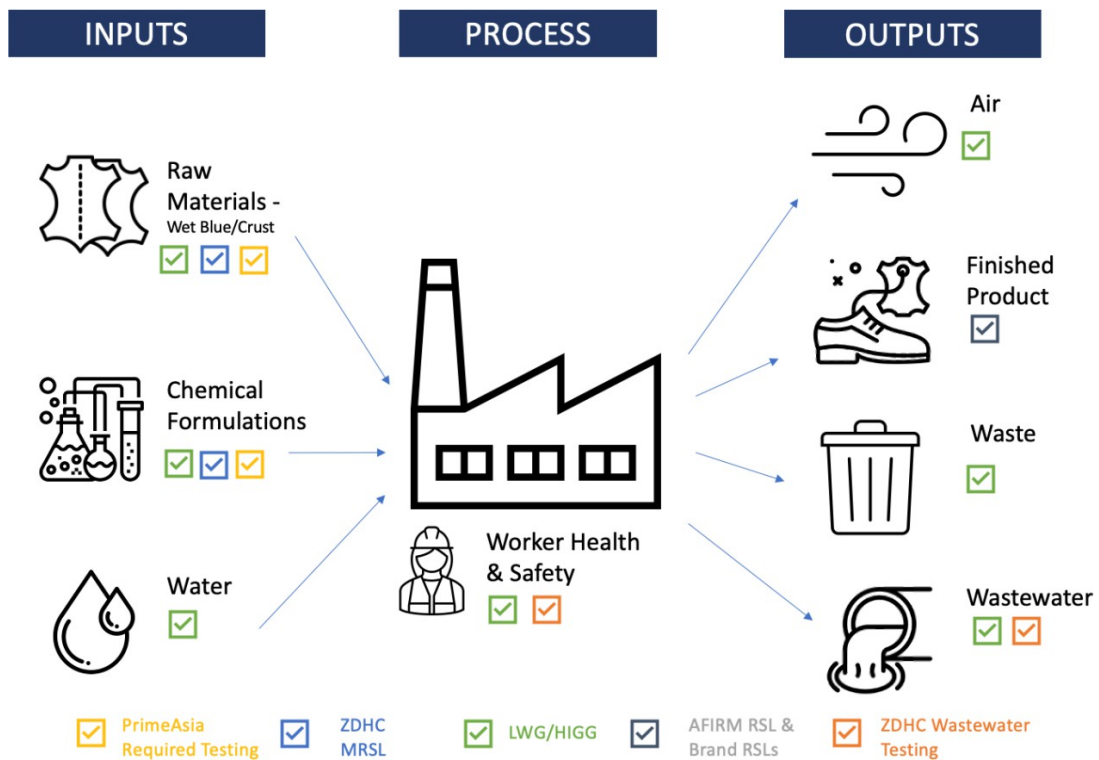
## PrimeAsia Leather Restricted Substance Policy (RSP)


As part of PrimeAsia’s approach to achieve our Consciously Crafted sustainability strategy and our ambition to eliminate hazardous chemicals, we are committed to using safer substance in the processes required to manufacture our products and protect our consumers, workers, sourcing communities, and the natural environment.

In order to achieve our chemical ambition, we ensure that PrimeAsia tanneries and our suppliers maintain responsible chemical management systems to mitigate chemical risks at the inputs, process and outputs stages of production. PrimeAsia established a Restricted Substance Policy (RSP) in line with international laws and regulations that restrict the use, type and concentration of potentially hazardous substances. All supply chain partners are required to comply with PrimeAsia’s RSP as a condition of doing business with PrimeAsia.

The RSP will be reviewed every 6 months, and any updates will be communicated to suppliers.

## Chemical Flow Map and Processes to Mitigate Risk



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## Chemical Supplier RS Policies

To address risk in our chemical management systems we have adopted the following policies:

### Required Chemical Supplier Testing:

All chemical suppliers are required to provide additional testing according to our Per – and Polyfluoroalkyl Chemicals (PFAS) and VOCs/Solvents policies below.

Expectation for chemical suppliers to achieve Level 3 ZDHC MRSL v. 3.1 Certification for chemicals supplied to PrimeAsia or have a roadmap in place for achieving Level 3 ZDHC MRSL v. 3.1 Certification. For products that are not registered with ZDHC, we require 3rd party annual testing by the supplier to confirm they are adhering to [ZDHC MRSL v. 3.1](#), or the most updated version.

### Per and Polyfluoroalkyl Substances (PFAS):

Intentional use of PFAS is banned for all chemical products supplied to PrimeAsia. Formulations containing PFAS are often used for water or stain repellency. All chemical suppliers are required to submit annual Total Fluorine tests (EN 14582:2016 or ASTM D7359:2018) for all products supplied to PrimeAsia.

PrimeAsia's limit for Total Fluorine is 50ppm, any products testing above this limit will be phased out.

### VOCs/Organic Solvents:

Despite the advancement of water-based systems, there are a small number of solvent-based systems that remain the most prevalent in the industry, and it will take time to phase these out completely. PrimeAsia is actively looking to phase out VOCs/Organic Solvents.

Cresol (all isomers), CAS Numbers – 1319-77-3, 95-48-7, 108-39-4, 106-44-5:

Intentional use of cresols is banned for all chemical products supplied to PrimeAsia. PrimeAsia requires that any products containing cresols must be disclosed and suppliers are expected to follow limits in ZHDC MRSL 3.1 for leather (500mg/kg).


N, N-Dimethylformamide (DMFa), CAS Numbers 68-12-2:

Intentional use of DMFa is banned for all chemical products supplied to PrimeAsia. Suppliers are expected to follow limits in ZHDC MRSL 3.1 for leather (1000mg/kg).

### PrimeAsia Chemical Testing:

To monitor conformance to PrimeAsia's RSP, we will regularly test chemicals for high-risk substances in a third-party lab. We aim to test 30% of chemicals annually, prioritizing non-ZHDC registered chemicals, ZDHC Levels 1&2 and other high-risk chemicals.

Should PrimeAsia find a non-compliance, the chemical supplier will need to complete a Corrective Action Plan and remediate the non-compliance within 180 days.

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If there is a second non-compliance, a warning letter will be sent to the supplier, and the supplier will be required to hire a third-party consultant to audit their chemical management systems and develop a remediation plan.

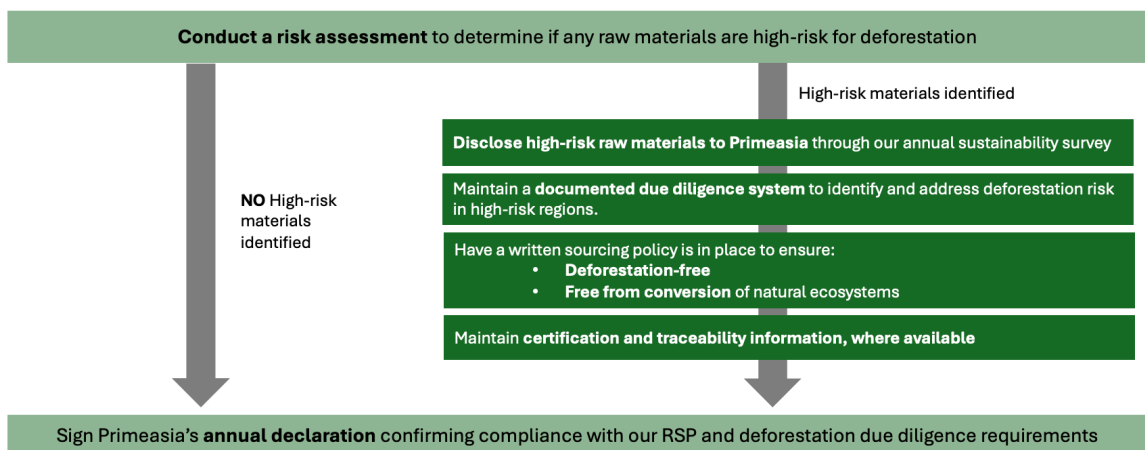
If there is a third non-compliance, the supplier would be put on probation and business could with PrimeAsia could be suspended.

### Deforestation Due Diligence Compliance


All chemical suppliers must ensure that the raw materials, intermediates, and feedstocks used in their manufacturing processes are not sourced from operations linked to deforestation or ecosystem conversion. This includes but is not limited to forests, grasslands, savannas, and wetlands. Suppliers are required to conduct a risk assessment to determine if any raw materials are high-risk for deforestation. If there are high-risk materials identified, suppliers must maintain full traceability to origin for any bio-based, plant-derived, or animal derived inputs and must implement a documented due-diligence system that verifies compliance with No Deforestation, No Peat, No Exploitation (NDPE) principles, applicable national laws, and recognized international frameworks such as the Accountability Framework Initiative (AFI).

Upon request, supporting documentation and third-party verification (where applicable) demonstrating that their sourcing practices do not contribute to deforestation or conversion of protected biomes. By signing PrimeAsia’s RSP, suppliers are declaring that they are abiding by our deforestation due diligence compliance requirements. Suppliers must immediately disclose any non-compliance or risk exposure within their upstream supply chain.

**Deforestation Due Diligence Chemical Supplier Flow Chart:**



High-risk raw materials linked to deforestation and conversion risk include:

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- **Wood/pulp products**
- **Palm oil derivatives**
- **Natural rubber**
- **Cocoa**
- **Soy derivatives**

If suppliers source high-risk raw materials from this list, they must be able to provide evidence that they are fully traceable with no risk of deforestation from the following regions commonly linked to deforestation and conversion risk:

- Amazon Biome - (Brazil, Argentina, Paraguay)
- Cerrado Biome - (Brazil)
- Gran Chano Dry Forests - (Argentina, Paraguay, Bolivia)
- Southeast Asian Tropical Forests - (Indonesia, Malaysia, Papua New Guinea)
- Congo Basin - (Central African Rainforest)

#### **Chemical Supplier Responsibilities:**

- Review PA's RSP and Chemical Supplier RS Policy and confirm that they understand and can follow our policies.
- Conduct mandatory testing requirements for PFAS and Solvents/Organic VOCs.
- Register and upload chemical formulations on ZDHC Gateway
- Provide ZDHC ChemCheck Reports for all chemical formulations on an annual basis or once chemical formulations are updated.
- Provide chemical formulation's Safety Data Sheets (SDS) in the Globally Harmonized System of Classification and Labeling of Chemicals.
- Ensure that chemical formulations meet international laws and regulations including California Proposition 65, REACH, etc.

#### **Additional Resources**


##### **ZDHC Gateway**

The ZDHC Gateway is an online tool for chemical suppliers, manufacturers, and brands. The Chemical Module contains a platform that enables suppliers to find chemical formulations that meet the requirements of ZDHC's MRSL and track adoption of ZDHC MRSL Level 3.


##### **PrimeAsia Self-Certification**

For suppliers that are not registered with ZDHC, they are required to complete PrimeAsia's Self-Certification in appendix 1.

##### **Recommended Testing Facilities**

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Testing facilities must be accredited officially and certified in accordance with DIN/EN 45001 or DIN/ISO/IEC 17025 can be used for testing. Suppliers may be asked to provide copies of the testing facilities accreditation, as needed.

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## Chemical Supplier Certification of Compliance

The undersigned hereby acknowledges the receipt of the PrimeAsia Restricted Substance Policy, Deforestation Due Diligence Compliance Requirements and Chemical Supplier RS Policy. The RSP, Deforestation Due Diligence Compliance Requirements and Chemical Supplier RS Policy are intended for mitigating risk against restricted substances in PrimeAsia's products. The undersigned certifies that product supplied to PrimeAsia will comply with our RSP/Deforestation Due Diligence Compliance Requirements/Chemical Supplier RS Policy.

### Signature 簽名

Name 姓名(Print 打印): \_\_\_\_\_

Company 公司名稱: \_\_\_\_\_

Title 在公司職稱: \_\_\_\_\_

Address: \_\_\_\_\_


Date 日期: \_\_\_\_\_

(Day/Month/Year)

Send to:

Contact Person:	Telephone:	Email:
Fanny Lin	886-4-7695101 ext 3333	<a href="mailto:fannylin@pouchen.com">fannylin@pouchen.com</a>
Phyllis Lu	886-4-7695101 ext 3346	<a href="mailto:Phyllislu@pouchen.com">Phyllislu@pouchen.com</a>
Rose Lu	886-4-7695101 ext 3337	<a href="mailto:rose.lu@pouchen.com">rose.lu@pouchen.com</a>

**Pou Chen Corporation**  
**Global Supply Chain Management**  
**No. 2 Fu Kung Road, Fu Hsin Hsian, Chang Hwa, Taiwan**

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### Appendix 1: RS Substances Self-Certifying List


公司/ **Company Name:**

產品名稱/ **Product:**


For any substance not listed in ZDHC MRSL Version 3.1, but listed on the European Chemicals Agency's (ECHA) Substances of Very High Concern candidate list and contained in the chemical product, please list the substance and the % contained in the product at the bottom of the self-certify list on page 11. See the below website for the list of ECHA restricted chemicals.

a. <http://echa.europa.eu/candidate-list-table>


Substances	不含 None	含 % contained	成份單位 ppm	備注 Remark
Antimony 銻				
Cadmium 鎘				
Arsenic 砷				
Chromium(VI) 六價鉻 Cr6+				
Lead 鉛				
Mercury 汞				
Copper 銅				
Nickel 鎳				
Cobalt 鈷				
PH 酸鹼值				

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Substances	不含 None	含 % contained	成份單位 ppm	備注 Remark
<b>Pentachloroplenol/Tetrachlorophenol and all other chlorinated phenols</b> 五氯酚(PCP)/四氯酚(TeCP) 和所有 其他氯化苯酚				
<b>O-phenyl-phenole</b> (O-PP)鄰苯基酚				
<b>Pesticides</b> 殺蟲劑				
<b>Azo Dyes</b> 偶氮類染料				
<b>Ozone Depleting Substance(class I andII) 耗臭氧物質</b>				
<b>Formaldehyde *see below</b> 甲醛				
<b>Polychlorinated Biphenyls(PCBS)</b> 多氯聯苯(PCBS)				
<b>Disperse Dyes</b> 分散染料				
<b>Chloroorganic Carriers</b> 有機氯化物載體				
<b>Tributyltin (TBT), Triphenyltin (TPhT)</b> 三丁基錫(TBT),三苯基錫(TPhT)				
<b>Monobutyltin (MBT) dibutyltin (DBT)</b> 單丁基錫(MBT) 二丁基錫(DBT)				
<b>Phthalates</b> 酯類				
<b>Flame retardants</b> 防燃劑				


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Substances	不含 None	含 % contained	成份單位 ppm	備注 Remark
Triphenyltin(TPhT) 三苯錫(TPhT)				
Dieldrin 地特靈				
DTTB(Timiperone) DTTB(替米呱隆)				
Chloralkines C10-C13 短鏈氯化石蠟 C10-C13				
N-Nitro Amine N-亞硝酸脂類				
Dioxins and Furans 戴奧辛及呋喃類				
PFAS Per-and polyfluoroalkyl substances 全氟/多氟烷基物質				
PFOS & PFOA and all forms of PFCs 全氟辛烷磺酸(PFOS)辛酸(PFOA) 和 所有形式的全氟化合物(PFCs)				
PCP 衍生物 PCPL 五氯苯酚衍生物月桂酸五氯苯酯 (PCPL)				
Trichloropenol(TCP) and other Chlorophenols 三氯乙, TriCP, TeCP 三氯苯酚和其他氯酚,三氯苯酚 ( TriCP ),四氯苯酚 ( TeCP )				
Polyvinyl Chloride(PVC) 聚氯乙烯(PVC)				
Whale oil 鯨魚油				
Σ of NP, OP, NPEO and all APEO polymers 壬基酚,壬基酚乙氧基化物				
Asbestos 石棉				


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<b>Monomethyldiphenylme- Thane (Ugilec 121 or 21)</b> 單甲基二溴二苯甲烷				
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Substances	不含 None	含 % contained	成份單位 ppm	備注 Remark
<b>Monomethyltetrachlorodip Henylnmethane(Ugilec141)</b> 單甲基四氯二苯甲烷				
<b>Polychlorinated Terphenyls</b> 多氯聯三苯				
<b>Vinyl chloride</b> 氯乙烯				
<b>Cresol(All Isomers)(Methylphenol)</b> 甲酚 ( 所有異構體 ) ( 甲基苯酚 )				
<b>Barium</b> 鋇				
<b>Selenium</b> 硒				
<b>Pentachloroethane</b> 五氯乙烷				
<b>Phenol</b> 酚				
<b>Tetrachloronethane</b> 四氯化碳				
<b>1,1,2,2- Tetrachloroethane</b> 四氯乙烷(不對稱)				
<b>1,1,2,2- Tetrachloroethane</b> 順式-四氯乙烷				

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Substances	不含 None	含 % contained	成份單位 ppm	備注 Remark
Toluene 甲苯				
Xylene (All Isomer) 二甲苯 (所有異構體)				
Cyclohexanone 環己酮				
Dimethylsulfoxide(DMSO) 二甲亞風(DMSO)				
n-Hexane 正己烷				
Methylene Chloride(MC) 二氯甲烷(MC)				
N-Methyl Pyrrolidone(NMP) N-甲基四氫吡咯(NMP)				
N,N-Dimethyl Acetamide (DMAC) 二甲基乙醯胺(DMAC)				
N,N-Dimethyl Formamide(DMFA) 二甲基甲醯胺(DMFA)				
Tetrahydrofurane(THF) 四氫呋喃(THF)				
Trichloroethylene(TCE) 三氯乙烯(TCE)				
Tetrachloroethylene 四氯乙烯				
Toluene Diisocyanate(TDI) 間-甲苯二異氰酸酯(TDI)				

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Substances	不含 None	含 % contained	成份單位 ppm	備注 Remark
<b>Cellusolve Acetate</b> 乙二醇乙醚乙酸酯				
<b>Methyl Cellusolve</b> 乙二醇甲醚				
<b>Methyl Cellusolve Acetate</b> 乙酸乙二醇甲醚				
<b>Short chained Chloroparaffines C10 to c13 (SCCP)</b> 短鏈氯化石蠟C10 to c13 (SCCP)				
<b>Additional substances listed on REACH or SVHC please list here</b> REACH 高度關注物質請列於此				
<b>1</b>				
<b>2</b>				
<b>3</b>				
<b>4</b>				
<b>5</b>				

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Substances	不含 None	含 % contained	成份單位 ppm	備注 Remark
Dimethyl fumarate 富馬甲二酸酯				
Chlorobenzenes and Chlorotoluenes 氯苯和氯甲苯				
Glycol Ethers ZDHC Leather MRSL list see Appendix 1h for list 乙二醇醚 依循 ZDHC MRSL 規範				
Halogenated Solvents (except Trichloroethylene which can have up to 40) 鹵化溶劑				
Other Organotin Compounds: DMT,MBT,MOT,DOT,TCyHT, TOT, TPT,TMT,TPHT, TBT 其他有機錫化合物： DMT,MBT,MOT,DOT,TCyHT, TOT, TPT,TMT,TPHT, TBT				
Polycyclic Aroamtic Hydrocarbons (PAHs) 多環芳烴 (PAHs)				
Naphthalene 萘				
Benzene 苯				
VOCs o-cresol, p-cresol and m-cresol 揮發性有機物 鄰甲酚、對甲酚和間 甲酚				
BHT Free 2,6-二丁基羥基甲苯 零檢出				

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<b>NOx Free</b> 氮氧化物 零檢出				
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## Appendix 1: Self-Certification Letter of Guarantee

The undersigned hereby acknowledges receipt of the PrimeAsia Restricted Substance Policy (“RSL”) and is self-certifying that the following product is in compliance with all aspects of the PrimeAsia RSL, international laws and in accordance with the data provided here within. Appendix 1’s can be filled and sent in electronically as long as the signature is verified.

產品名稱/ **Product:**

If a product is the exact same (no change in the formula from the previous year’s version and submitted an Appendix 1 table in a past year 2012-2018) then the self-certifying table does not need to be filled out. However, this Letter of Guarantee must be filled out for every product annually.

### Signature 簽名

Name 姓名(Print 打印):

Company 公司名稱:

Title 在公司職稱:

Address:

Date 日期:

(Day/Month/Year)

Send to:

Contact Person:	Telephone:	Email:
Fanny Lin	886-4-7695101 ext 3333	fannylin@pouchen.com
Phyllis Lu	886-4-7695101 ext 3346	Phyllislu@pouchen.com
Rose Lu	886-4-7695101 ext 3337	rose.lu@pouchen.com

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