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	PrimeAsia Restricted Substance Policy for Suppliers		Effective Date: February 1st, 2025

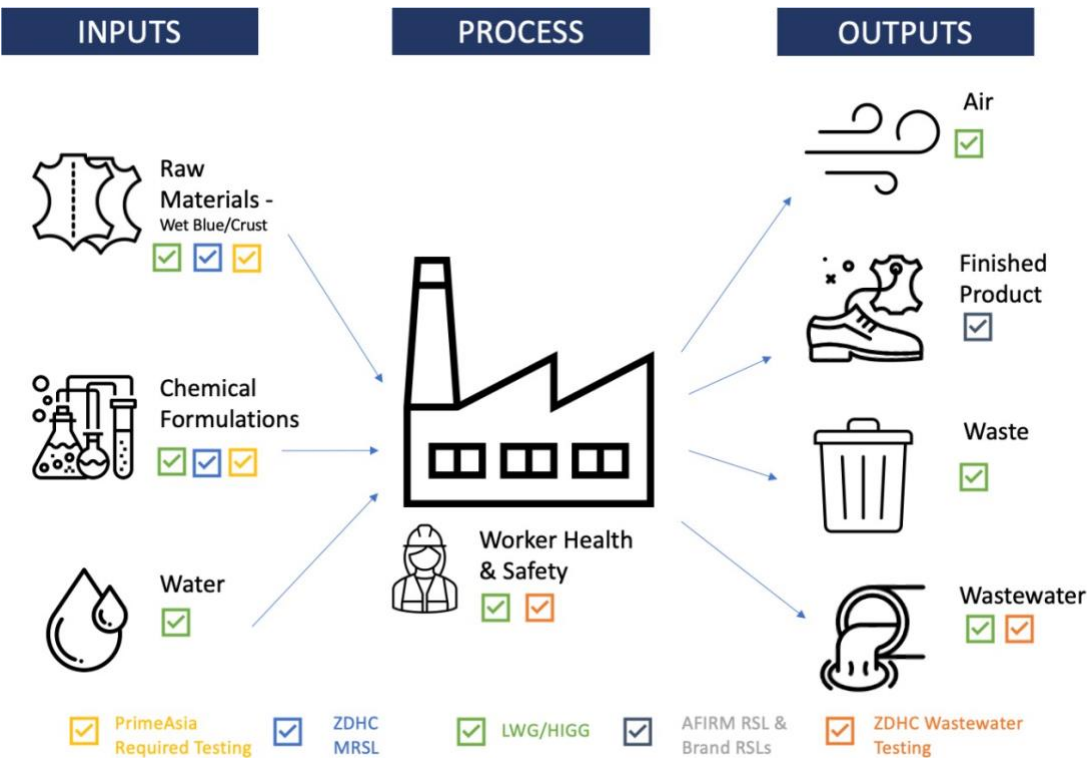
PrimeAsia Leather Restricted Substance Policy (RSP)

As part of PrimeAsia’s approach to achieve our Sustaining Excellence, Preserving Tomorrow priority 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 regulationsthat restric 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 before they take effect.

Chemical Flow Map and Processes to Mitigate Risk



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Chemical Supplier RS Policies

In order 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 Perfluoralkyl Chemicals (PFAS) and VOCs/Solvents policies below.

Expectation for chemical suppliers to achieve Level 3 ZDHC MRSL 3.1 Certification for chemicals supplied to PrimeAsia or have a roadmap in place for achieving Level 3 ZDHC MRSL 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 3.1](#).

Per and Polyfluorinated Alkyl Substances (PFAS):

All PFAS are 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:

PrimeAsia requires that any products containing cresols must be tested by suppliers by a 3rd party lab (using GC-MS methodology). Suppliers need to have no cresols in products supplied to PrimeAsia by 2025.

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

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

PrimeAsia Chemical Testing:

In order 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-ZDHC 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.

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

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 and Chemical Supplier RS Policy. The RSP 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/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	fannylin@pouchen.com
Phyllis Lu	886-4-7695101 ext 3346	Phyllislu@pouchen.com
Rose Lu	886-4-7695101 ext 3337	rose.lu@pouchen.com

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
Pentachloropenol/Tetrachlorophenol and all other chlorinated phenols 五氯酚(PCP)/四氯酚(TeCP) 和所有 其他氯化苯酚				
O-phenyl-phenole (O-PP)鄰苯基酚				
Pesticides 殺蟲劑				
Azo Dyes 偶氮類染料				
Ozone Depleting Substance(class I andII) 耗臭氧物質				
Formaldehyde *see below 甲醛				
Polychlorinated Biphenyls(PCBS) 多氯聯苯(PCBS)				
Disperse Dyes 分散染料				
Chloroorganic Carriers 有機氯化物載體				
Tributyltin (TBT), Triphenyltin (TPhT) 三丁基錫(TBT),三苯基錫(TPhT)				
Monobutyltin (MBT) dibutyltin (DBT) 單丁基錫(MBT) 二丁基錫(DBT)				
Phthalates 酯類				
Flame retardants 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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Monomethyldiphenylme- Thane (Ugilec 121 or 21) 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
Monomethyltetrachlorodip HenyImethane(Ugilec141) 單甲基四氯二苯甲烷				
Polychlorinated Terphenyls 多氯聯三苯				
Vinyl chloride 氯乙烯				
Cresol(All Isomers)(Methylphenol) 甲酚 (所有異構體) (甲基苯酚)				
Barium 鋇				
Selenium 硒				
Pentachloroethane 五氯乙烷				
Phenol 酚				
Tetrachloronethane 四氯化碳				
1,1,2,2- Tetrachloroethane 四氯乙烷(不對稱)				
1,1,2,2- Tetrachloroethane 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
Cellusolve Acetate 乙二醇乙醚乙酸酯				
Methyl Cellusolve 乙二醇甲醚				
Methl Cellusolve Acetate 乙酸乙二醇甲醚				
Short chained Chloroparaffines C10 to c13 (SCCP) 短鏈氯化石蠟C10 to c13 (SCCP)				
Additional substances listed on REACH or SVHC please list here REACH 高度關注物質請列於此				
1				
2				
3				
4				
5				

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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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NOx Free 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
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