



NEW PEL COMPANY S.r.l.
VIA VICENZA, 56, 36071 ARZIGNANO (VI)

COMPANY POLICY ON DANGEROUS SUBSTANCES

Rev.1 Updated on December 2023

This document has been drawn up in support of the integrated policy adopted by our company for the correct use and control of chemicals in chemicals products, leather purchased and products, in order to protect human health and the environment and constitutes for us a guarantee commitment to our customers.

In specific:

- 1) The **Commercial Manager takes charge of every specification received from Customers** that ensures compliance with the legal requirements and customer specifications themselves.
- 2) New Pel Company S.r.l. carries out regular tests on finished leather, analyzing the parameters defined in the internal PRSL on each macro - family of articles and/or following customer requests. The following analyses shall be carried out at least once a year on the finished product.

Parametro (Parameter)	Udm (MU)	PRSL INTERNA PELLAMI Limiti (Limits)
Formaldehide EN ISO 17226 – 1:2021	mg/Kg	< 75
Chromium VI UNI EN ISO 17075-2:2017	mg/Kg	< 3,0
Metal Content. Part 1: Extractable metals- UNI EN ISO 17072-1:2019 + UNI EN ISO 11885:2009	mg/Kg	Heavy Metals – Extractable Antimony [Sb] < 30 Arsenic < 0,2 Baryum < 1000 Cadmium < 0.1 Cobalt < 4 (for child < 1) Copper < 50 (for child < 25) Mercury < 0,02 Lead < 1 (for child < 0,2) Nickel < 1 Selenium < 500

- 3) Tests are carried out in **laboratories accredited to ISO 17025** or carrying out the analysis activities in accordance with the standard.
- 4) The staff of the sales office, undertakes to maintain an active communication with the customer by **periodically requesting the status of the PRSL adopted**. In case the customer does not have its own PRSL, the commercial manager the internal RSL.
- 5) **The suppliers of chemical products** of New Pel Company S.r.l. are required to provide, in addition to the Safety Data Sheet (SDS) required by law and the data sheet, all the information necessary to certify the absence, or the content of any hazardous substances referred to in Annexes 14 and 17 of Reg. reach, in the **SVHC Candidate** List identified by ECHA (European Chemical Agency), in **Reg. 2019/101/EU** (persistent organic pollutants, **Pops**), in Reg. 528/2012/EU (biocides), in **MRSLS ZDHC and ZDHC - addendum** and in MRSLS customers (at the request of the tannery) also through the subscription of a specific supply specification and any other forms of declaration.
- 6) The procurement of works entrusted to external companies is kept under control through the request to all suppliers to subscribe to a specific supply specification, in order to ensure the compliance of the process with this RSL Policy and the other specific RSL Policies shared by the New Pel Company S.r.l. with its customers.



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- 7) **Leather suppliers** are required to provide all information necessary to certify the absence, or the content, of any dangerous substances that may be contained in hides and skins covered by Annexes 14 and 17 of Reg. reach, in the ECHA (European Chemical Agency) **Candidate List SVHC, Reg. 2019/101/EU** (persistent organic pollutants, Pops), Reg. 528/2012/EU (biocides), **MRSLS ZDHC and ZDHC - addendum, in the MRSLS customers** (at the request of the tannery) and in the UNI rules on leather and leather, as well as in this RSL Policy through the signing of specific specifications and any other forms of declaration.
- 8) The technical staff of the department, will evaluate any new chemicals introduced in the work process, checking the content of substances subject to restrictions through evaluation of the safety data sheet, the technical and the declarations of conformity required in advance, through the verification of the CAS and the possible registration on the ZDHC Gateway. If a chemical is replaced in the production cycle, This is documented through the receiving cards and new products are subjected to new chemical analysis if the Company deems it necessary following the prior assessment of the chemical.
- 9) If chemicals are detected that do not comply with the restrictions in this RSL Policy, procedures to contain their use will be implemented with the management. In detail, the usual supplier will be asked to collect the product in use and provide an alternative. If the supplier of non-compliant products is unable to take corrective action, compliant chemicals from other suppliers will be assessed with the management.
- 10) New Pel Company S.r.l. is equipped with a computer system to control the restricted substances contained in the purchased products, through identification of CAS numbers (the computer system is updated periodically by Company, every six months, introducing any new substances subject to restrictions).
- 11) The specifications on restricted substances are reviewed periodically (at least every 12 months), during the Management's review, in accordance with current legislation and customer requests.

New Pel Company S.r.l. declines, however, any responsibility in cases where the leather, after shipment, are put in contact with products containing chemicals that do not comply with the regulations or are processed with products that do not comply with the law or are stored in unsuitable environments.

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