REACH Registration and Pre-registration

Sun Chemical has successfully registered all substances with 2010 deadline. We will inform you registration numbers as part of updated Safety Data Sheets. None of the registrations require exposure scenario as they are either non-hazardous or monomers in imported polymers. It is our intention to register all substances for which we are liable with the timelines 2013 and 2018 as given by REACH.

Sun Chemical does not provide specific information on product composition or when we will register individual ingredients or from where we will source the products. This is regarded as confidential business information.

We can inform that for all substances with registration deadline 2013, we are currently working as co-lead company for consortia or monitoring closely consortia working on joint registration dossier. All consortia are expecting to meet the deadlines for joint submission registration.

This letter also confirms Sun Chemical Performance Pigments and Sun Chemical Inks have successfully pre-registered all substances for which we are liable as importer or manufacturer to pre-register. Customers purchasing from Sun Chemical outside EU will not be covered by the pre-registration or registrations.

We have also received confirmation from all non-EEA suppliers setting up only representatives in EEA that Sun Chemical import will be covered by intended registration. Sun Chemical will inform you on registration when registration numbers are available. This will be part of an updated Safety Data Sheet.

Sun Chemical will not use the pre-registration number for confirmation as this number is not mandatory information in the supply chain and therefore does not exist for all substances we have available.

In case suppliers will not register we will inform you as soon as we have the information and advice on alternatives to ensure our customers’ success. We have identified alternative suppliers for the majority of our raw materials.

Sun Chemical products are mainly mixtures of substances. A REACH-compliant product will therefore be dependant on the requirements for the individual substances in the product. This will include per substance: time-line for registration, hazard profile and restrictions/authorization if any.

We will ensure compliance and include registration numbers in our SDS following registration. We will also provide exposure scenarios including exposure estimates where required (substances above 10 ton per year). The SDS may change for some of our products over the next few years, but the product will be REACH compliant at any given point in time.
Information on substances of very high concern

This information is valid for the candidate list found on ECHA’s homepage including 73 substances as updated on 19 December 2011, as well as Annex XIV 1st, 2nd and 3rd recommendations.

Sun Chemical’s products intended for the EU market do not contain any known amounts of substances of very high concern (SVHCs) at more than 0.1% (or the lowest concentration limit specified in Part 3 of Annex VI to Regulation (EC) No 1272/2008 which results in the classification as a SVHC), which could be subject to potential future authorization process (as outlined in REACH Art 56). For customers outside of the EU, please request our current EU label and SDS when considering exports to the EU based upon our non-EU products.

The Sun Chemical stewardship program does not accept listed candidate SVHC’s as part of new products and we are looking to substitute those in our existing non-EU product portfolio. Information on substance use restrictions will continue to be communicated as part of our SDS.

Articles are specifically excluded from consideration under REACH, however there are specific circumstances related to articles where this does not apply. In these cases, we recommend that you contact your REACH specialist.

In case any further information is required we kindly ask you to contact your Sun Chemical sales representative.

Substance Evaluation

Substance evaluation is the process under REACH that allows for risk clarification of substances which are suspected of posing risk to human health or the environment. ECHA has recently published the first draft of substances for evaluation under the program known as “Community Rolling Action Plan” (CoRAP) through 2015. The draft plan contains substances for which there is a suspicion that their use could pose a risk to human health or the environment. In general, the uses of these substances cover various areas and are not focusing on any particular industrial, professional or consumer uses. Following the evaluation further information may be requested from the registrants of the substances if additional data is considered necessary to clarify the suspected risk. Alternatively, it may be concluded that the substance does not constitute a risk and no further data is needed.

Hence, Sun Chemical regards the evaluation as a tool to clarify the risk and may in future clarify the need for further exposure control, restriction in use or listing as SVHC based on sound science. Sun Chemical does use some of the substances listed on CoRAP, but is not a registrant of any of the substances. We will as soon as we have further information provide more information, mainly as part of the SDS. Chemical substances on the CoRAP list have not in all cases been determined to be hazardous to human health and the environment in the Eu under the guidelines of CLP; for those that have they are currently disclosed in Section 3 of our SDS for each product.
CLP-regulation

Regulation (EC) No 1272/2008 on the classification, labelling and packaging of substances and mixtures (CLP Regulation) require any manufacturer or importer to:

1) notify European Chemical Agency (ECHA) on classification for all hazardous substances and all non-classified substances imported or manufactured above 1 tpa.

2) First notification must be done for all substances on the market 1 December 2010 before January 3rd, 2011

3) Any other substance placed on the market must be notified within 1 month after placing on the market.

Sun Chemical has notified to ECHA all substances on the market 1 December 2010 identified by CAS nos, that Sun Chemical manufacture within Europe or import into an European Sun Chemical legal entity.

We have also an internal procedure to make sure new substances for which we are liable to notify ECHA will be notified within 1 month after their placing on the market.

For customers where an agreement is in place, Sun Chemical has also notified ECHA on classification, this apply e.g. to customers receiving products from Sun Chemical Switzerland or Sun Chemical Turkey.

For customers, where we have no agreement in place, Sun Chemical has not notified ECHA.

Exposure Scenarios, Identified uses and Use Descriptor System

It is the right of any Sun Chemical customer to inform us on known uses to make it an identified use and become included in chemical safety assessment including preparation of exposure scenarios.

Sun Chemical will as reliable supplier consider any identified use made known to us where the REACH-legislation require us to, and where Sun Chemical is not the registrant we shall pass on the information to our suppliers.

However, we need customers to accept that it is not necessary in the following cases according to REACH article 14 and 37.4:

- The EU SDS supplied by Sun Chemical informs the product is not classified, does not contain information on a dangerous substance >1% (w/w) or does not contain information on candidate substances, PBTs or vPvBs >0.1%(w/w).
- The purchase of a Sun Chemical product is less than 1 tonne per year
- If a Chemical Safety Report is not required to be completed
- If the substance volume registered by the registrant entity is less than 10 tonne per year

We already supply information on appropriate risk management recommendation in the SDS for preparations and substances in above instances.

Sun Chemical will request suppliers to include or pass up the supply chain the following uses for inks related materials:

<table>
<thead>
<tr>
<th>Product Category</th>
<th>Sector of Use</th>
<th>Process Category</th>
<th>Article Category</th>
<th>Environmental Release Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Manufacture</td>
<td>PC 18</td>
<td>SU 10</td>
<td>PROC 1, 2, 3, 5, 8a, 8b, 9</td>
<td>N/A</td>
</tr>
<tr>
<td>Application</td>
<td>PC 18</td>
<td>SU 3</td>
<td>PROC 2, 3, 4, 5, 8b, 10</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Ref. ECHA Guidance on information requirements and chemical safety assessment, version 1.2, May 2008
Sun Chemical will implement generic exposure scenarios developed by CEPE as soon as possible. We are currently not in a position to distribute for inks and inks related materials, but we will forward all ES received by suppliers to ensure compliance.

Pigments and pigment preparations are generally speaking not classified and the Chemical Safety Report is not required to be completed and exposure scenarios will not be developed. For the registration dossier we will include PC, SU, PROC, AC and ERC as required for registration and the continued use by Sun Chemical customers, including personal care products.

For pigments and pigment preparations classified as dangerous and purchased above 1 tonne per year we recommend contacting us for inclusion of your specific use.

Sincerely Yours

Ivan Gønning
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