November 5, 2025

UPM Adhesive Materials compliance statements

These statements are valid for label materials manufactured by UPM Adhesive Materials in APAC (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 APAC factories.

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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

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 one or more additive(s)/substance(s) synthesized from animal extracts for example the hydrolysis of animal fats (tallow) into fatty acids.

Please note that the animal sourced raw materials typically have been chemically altered from their original structure and have undergone significant chemical processing and are therefore considered synthetic.

UPM confirms that all ingoing components used further up in its supply chain which may be based on tallow are in strict compliance with the requirements of Regulation (EC) No 1069/2009 and its amendments regulating the use of material presenting risks as regards Transmissible Spongiform Encephalopathies (TSE).

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

UPM does not use Bisphenol A, Bisphenol B and Bisphenol S in the manufacture of its label materials either as a raw material or as an additive. Please note that some direct thermal faces and thermal boards may contain Bisphenol S.

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.
This information is 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 supplier surveys.

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.

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.

Halogen Free

The International Electrotechnical Commission (IEC) defines halogen free based upon the content level of chlorine and bromine as defined by industry specifications IEC 61249-2-21 and IPC-4101B. Products are classified and declared halogen free providing they meet the following content restriction.

Halogen Industry Specification:
Chlorine (Cl) < 900 ppm
Bromine (Br) < 900 ppm
Chlorine (Cl) + Bromine (Br) < 1500 ppm

UPM does not intentionally add any of the above substances in the manufacture of label materials. This information is 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 supplier surveys. Please note, UPM has not conducted any laboratory analysis to confirm the absence or presence of any of the substances listed above.

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. Based on its knowledge of label-stock processing, raw materials, review of available safety data sheets, supplier survey information and representative analysis, UPM 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 in the manufacture of its label materials either as a raw material or as an additive and has no reason to suspect these elements to be present in its label materials other than trace amounts that are ubiquitous in nature.

Organotin Compounds

UPM does not intentionally add organotin compounds, Monobutyltin (MBT), Monoctyltin (MOT), Tetrabutyltin (TeBT) and Tetraoctyltin (TeOT).
This information is provided 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 supplier surveys. Please note, UPM has not conducted any laboratory analysis to confirm the absence or presence of any of the substances listed above.

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. This information is based on UPM's knowledge of its raw materials and processing used in label materials, as well as a review of available material safety data sheets, and statements from its component suppliers for its label materials. Please note that no laboratory analysis has been conducted to confirm the absence or presence of any of these substances.

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, including lindane Methoxychlor	PCB Dicofol UV-328	PFOA its salts and related compounds PFHxS its salts and related compounds Dechlorane Plus

This information is based upon the knowledge of label-stock processing and raw materials, review of material safety data sheets, and supplier surveys. Please note, UPM has not conducted any laboratory analysis to confirm the absence or presence of any of the substances listed above.

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 or long-chain PFASs (“C8” and above) 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,

Based on information from its raw material suppliers, UPM has no reason to suspect that any of its label materials contain PAHs listed in the regulation above the allowable limits

Phthalates

Based on information from UPM's raw material suppliers, 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

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 November 5, 2025.

Information regarding SVHC's in UPM label materials for APAC 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.

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. This statement is based on information received from UPM's raw material suppliers and UPM's knowledge of label-stock raw materials and processing.
UPM has not conducted laboratory analysis to determine the presence or absence of RoHS regulated substances in its label materials.

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)

Tri-substituted organostannic compounds

Tri-substituted organostannic compounds, Tributyl Tin (TBT) and Triphenyl Tin (TPT) compounds are not used in the manufacture or formulation of UPM's label materials.

Please note that further processing and converting of the product must be assessed by the downstream users of the product and they must make their own determination for the suitability of their products for their desired end use applications.

Summary of changes

Date	*Comment*
July 8, 2024	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
November 26, 2024	Updated the REACH statement with reference to the date when the candidate list of Substances was updated.
November 27, 2024	Modified the REACH statement.
December 18, 2024	Modified the REACH statement to include a link to the APAC SVHC substances. 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 11, 2025	Updated the REACH statement with reference to the date when the candidate list of Substances was updated. Addition of sections on Animal parts, Recycling and Minerals and metals of concern. As well as changes to format and footers and the new brand name UPM Adhesive materials.
September 4, 2025	Add a section regarding Oxo-degradable materials. Updated the section on Persistent Organic Pollutants (POPS) including reference to Delegated Regulation (EU) 2025/843 and added UV-328. Minor changes to the wording and formatting throughout the document.
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.