

PRODUCT REGULATORY SUMMARY

MG-Guard™ AO-168

DATE: 04/08/2021

COMPOSITION

≥ 99% Tris (2,4-di-tert-butylphenyl) phosphite (CAS No. 31570-04-4)

ALLERGENS

MG-Guard™ AO-168 is not produced using nor expected to contain any of the 26 fragrance allergens listed in Annex III of Regulation (EC) No 1223/2009.

Additionally, MG-Guard™ AO-168 is not produced using nor expected to contain any of the common allergens listed below in accordance with Regulation (EU) No. 1169/2011 and the FDA Food Allergens Guidance.

- Cereals containing gluten and products thereof
- Crustaceans and products thereof
- Eggs and products thereof
- Fish and products thereof
- Peanuts and products thereof
- Soybeans and products thereof
- Milk and products thereof
- Tree nuts (walnuts, pecans, etc.) and products thereof
- Celery and products thereof
- Mustard and products thereof
- Sesame seeds and products thereof
- Sulfur dioxide and sulfites
- Lupin and products thereof
- Mollusks and products thereof

ANIMAL CONTENT

MG-Guard™ AO-168 is manufactured completely from synthetic materials and does not contain any raw materials that are produced from, or substances derived from animal origin.

While MG-Guard™ AO-168 is not certified to be Kosher, we believe it to be compliant with Kosher regulations. The origin and source of the raw materials used for production of these products are chemical and mineral. No animal or vegetable source raw materials are used.

Moreover, MG-Guard™ AO-168 is not derived from specific-risk materials as defined in European Commission Decision 97/534/EC. The manufacturing process does not use any ingredient of animal origin nor does this product come in contact with animal-derived products during storage and transportation.

Therefore, MG-Guard™ AO-168 is expected to be free from Transmissible Spongiform Encephalopathy (TSE) and Bovine Spongiform Encephalopathy (BSE).

CALIFORNIA PROPOSITION 65

MG-Guard™ AO-168 is not expected to contain any substances known to the State of California to cause cancer, birth defects, or other reproductive harm, at levels which would require a warning under California Proposition 65, Safe Drinking Water and Toxic Enforcement Act of 1986 as of March 19, 2021.

CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT

Barentz North America, LLC fully supports California's efforts to protect human rights and enforce ethical labor practices under the California Transparency in Supply Chains Act of 2010 (SB 657).

Barentz is proud of our reputation and record for integrity and respect in dealing with our own employees and expects nothing less of our suppliers in their dealings with their workforce. We work closely with our suppliers to ensure that they do not engage in or support forced labor or unlawful child labor.

We are committed to ensuring that working conditions in our supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally and socially responsible. Additionally, we expect our suppliers to adopt and maintain terms of employment for their employees that comply with local law and the requirements of our Supplier Code.

CARCINOGENS, MUTAGENS, TOXIC FOR REPRODUCTION (CMR)

MG-Guard™ AO-168 is not expected to contain any carcinogens, mutagens, or toxic for reproduction (CMR) substances outlined within Annex II of Council Directive 76/769/EEC.

CERTIFICATE OF ORIGIN

MG-Guard™ AO-168 is produced in Taiwan. Therefore, this product does not qualify for the United-States-Mexico-Canada Agreement (USMCA).

CONEG (DIRECTIVE 94/62/EC)

None of the toxic elements—Cadmium, Hexavalent Chromium, Lead, or Mercury—are used as raw materials nor deliberately added during the manufacturing process of MG-Guard™ AO-168.

With this in mind, MG-Guard™ AO-168 is expected to be free from the above-mentioned toxic elements. Any incidental amount would be expected to be less than 100 parts per million (ppm).

CONFLICT MINERALS

Barentz North America LLC is committed to being a responsible corporate citizen and is opposed to human rights abuses. As part of that commitment, Barentz North America LLC seeks to source products, components, and materials from companies that share our values around human rights, ethics, and environmental responsibility.

In August 2012, the U.S. Securities and Exchange Commission ("SEC") adopted final rules implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Conflict Minerals Rule"). Under these rules, publicly traded companies must annually report to the SEC whether the products they manufacture or contract to manufacture contain "conflict minerals" originating from the Democratic Republic of the Congo (the "DRC") or adjoining countries. Revenue from the mining and transport of these conflict minerals is believed to be financing or benefiting groups that are responsible for human rights violations. "Conflict minerals" refers to columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin, and tungsten, without regard to the location or origin of the minerals or derivative metals.

Barentz North America LLC supports industry-wide efforts to identify, reduce, and hopefully eliminate the use of conflict minerals originating from the DRC and adjoining countries to the extent believed to be financing or benefiting groups committing human rights violations. Barentz North America LLC is committed to complying with any applicable requirements under the Conflict Minerals Rule.

Suppliers to Barentz North America LLC are expected to establish their own conflict minerals policies, due diligence frameworks, and management systems that are designed to prevent conflict minerals originating from the DRC or an adjoining country, to the extent that they benefit groups committing human rights violations, from being included in the products sold to Barentz North America LLC. In the event Barentz determines that a supplier has failed to develop and implement reasonable steps to comply with this Policy, Barentz North America LLC reserves the right to take appropriate actions, which may include discontinuing the business relationship with the supplier.

EU FOOD CONTACT (EUROPE)

We have reviewed MG-Guard™ AO-168 and confirm it complies with the compositional requirements set forth in Commission Regulation (EU) 10/2011, as amended. There is no specific migration limit associated with the use of this product. For substances which no specific migration limit is provided, a generic specific migration limit of 60 mg/kg applies.

MG-Guard™ AO-168 meets the quality and general principles outlined in Regulation (EC) 1935/2004 and 2023/2006. These regulations require a quality approach to manufacturing which is illustrated by Barentz North America LLC's ISO 9001 and Responsible distribution certifications.

FDA FOOD CONTACT (UNITED STATES)

We have reviewed the product MG-Guard™ AO-168 and can confirm that it complies with the requirements of the Code of Federal Regulation, 21 CFR §178.2010¹⁻²³.

¹At levels not to exceed 0.5 percent by weight of elastomers used in rubber articles complying with §177.2600 of this chapter.

²At levels not to exceed 1 percent by weight of nylon resins complying with §177.1500 of this chapter: Provided, that the finished polymer contacts food only under conditions of use E, F, and G described in table 2 of §176.170(c) of this chapter.

³At levels not to exceed 0.3 percent by weight of polycarbonate resins complying with §177.1580 of this chapter.

⁴At levels not to exceed 0.2 percent by weight of polystyrene and rubber-modified polystyrene polymers complying with §177.1640 of this chapter: Provided, that the finished polymer contacts food only under conditions of use B, C, D, E, F, G, and H described in table 2 of §176.170(c) of this chapter.

⁵At levels not to exceed 0.25 percent by weight of olefin polymers complying with §177.1520(c) of this chapter, item 1.1, 1.2, or 1.3.

⁶At levels not to exceed 0.2 percent by weight of olefin polymers complying with §177.1520(c) of this chapter, items 2.1, 2.2, 2.3, 3.1(a), 3.1(b), 3.1(c), 3.2(a), or 3.2(b). The finished polymers complying with items 2.1, 2.2, or 2.3 having a density less than 0.94 gram per cubic centimeter and a thickness greater than 0.051 millimeter (0.002 inch), either shall have a level of tris(2,4-di-tert-butylphenyl)phosphite that shall not exceed 0.062 milligram per square inch of food-contact surface or shall contact all food types identified in Table 1 of §176.170(c) of this chapter only under conditions of use E, F, and G described in Table 2 of §176.170(c) of this chapter.

⁷At levels not to exceed 0.2 percent by weight of ethylene-vinyl-acetate copolymers complying with §177.1350 of this chapter, and that are limited to use in contact with food only under conditions of use E, F, and G described in table 2 of §176.170(c) of this chapter. The average thickness of such polymers in the form in which they contact fatty food shall not exceed 0.1 millimeter (0.004 inch).

⁸At levels not to exceed 0.2 percent by weight of olefin polymers complying with §177.1520(c) of this chapter, item 4. The finished polymers having a thickness greater than 0.051 millimeter (0.002 inch), shall contact food only under conditions of use E, F, and G described in table 2 of §176.170(c) of this chapter.

⁹At levels not to exceed 0.5 percent by weight of acrylic and modified acrylic plastics, semirigid and rigid, complying with §177.1010 of this chapter.

¹⁰At levels not to exceed 0.1 percent by weight of isobutylene polymers complying with §177.1420 of this chapter.

¹¹In adhesives complying with §175.105 of this chapter.

¹²At levels not to exceed 0.5 percent by weight of pressure sensitive adhesives complying with §175.125 of this chapter.

¹³At levels not to exceed 0.5 percent by weight of can end cement formulations complying with §175.300(b)(3) (xxxi) of this chapter.

¹⁴At levels not to exceed 0.5 percent by weight of side seam cement formulations complying with §175.300(b)(3) (xxxii) of this chapter.

¹⁵At levels not to exceed 0.5 percent by weight of petroleum alicyclic hydrocarbon resins complying with §175.320(b)(3) of this chapter.

¹⁶At levels not to exceed 0.5 percent by weight of petroleum alicyclic hydrocarbon resins or their hydrogenated products complying with §176.170(b) (2) of this chapter.

¹⁷At levels not to exceed 0.5 percent by weight of resins and polymers complying with §176.180(b) of this chapter.

¹⁸At levels not to exceed 0.5 percent by weight of rosins and rosin derivatives complying with §176.210(d)(3) of this chapter.

¹⁹At levels not to exceed 0.5 percent by weight of closures with sealing gaskets complying with §177.1210 of this chapter.

²⁰At levels not to exceed 0.5 percent by weight of petroleum hydrocarbon resin, and rosins and rosin derivatives complying with §178.3800(b).

²¹At levels not to exceed 0.5 percent by weight of reinforced wax complying with §178.3850.

²²At levels not to exceed 0.5 percent by weight of olefin copolymers complying with §177.1520(c) of this chapter, item 3.3. The finished polymers may be used in contact with food under conditions of use A through H described in table 2 of §176.170(c) of this chapter.

²³At levels not to exceed 0.15 percent by weight of poly-1-butene resins and butene/ethylene copolymers complying with §177.1570 of this chapter: Provided, that the finished polymer contacts food only under conditions of use B through H described in table 2 of §176.170(c) of this chapter.

GB 9685 FOOD CONTACT (CHINA)

MG-Guard™ AO-168 complies with the compositional requirements set forth in China's GB9685 Hygienic Standard, as amended^{1,2}. There is no specific migration limit associated with the use of this product. For substances which no specific migration limit is provided, a generic specific migration limit of 60 mg/kg applies.

FCA Number: 1209

¹For use in PB-1 at a maximum usage level of 0.15%.

²For use in PE, PS, and EVA at a maximum usage level of 0.2%.

³For use in PP at a maximum usage level of 0.25%.

⁴For use in PEI and PC at a maximum usage level of 0.3%.

⁵For use in AS and ABS at a maximum usage level of 0.4%.

⁶For use in PA at a maximum usage level of 1.0%.

⁷For use in PAAM and PMMA at a maximum usage level of 0.5%.

GLOBAL INVENTORY STATUS

To the best of our knowledge, MG-Guard™ AO-168 is either exempt from or can be found as a positive listing on the chemical inventories listed below

- Australia — Australian Inventory of Chemical Substances (AICS)
- Canada — Domestic Substances List (DSL)
- China — Inventory of Existing Chemical Substances Produced or Imported in China (IECSC)
- Europe — European Inventory of Existing Chemical Substances (EINECS)
- New Zealand — New Zealand Inventory (NZIoC)
- The Philippines — Philippine Inventory of Chemicals and Chemical Substances (PICCS)
- South Korea — Korean Existing Chemicals List (KECI)
- Taiwan — Taiwan Chemical Substance Inventory (TCSI)
- United States — Toxic Substances Control Act Inventory (TSCA)

GLUTEN

MG-Guard™ AO-168 does not contain nor is it expected to come into contact with gluten or products containing gluten.

IMPURITIES & ADDITIVES

MG-Guard™ AO-168 is not manufactured using nor expected to contain any of the substances listed below in detectable amounts.

- Phthalates
- Substances in Commission Regulation (EC) No 1895/2005 – BADGE/BFDGE/NOGE
- Perfluoroalkylated Substances
- Nonylphenols
- Octylphenols
- GMOs
- Alkyl Phenol Ethoxylates – Octyl and Nonyl
- CMR Compounds
- PCBs
- Nanomaterials (300 nm or less)
- Organotin compounds
- Bisphenol compounds

REACH

MG-Guard™ AO-168 has been registered in accordance with REACH regulation (EC) No 1907/2006 by the manufacturer of this product.

Please contact your Barentz North America LLC account manager to discuss any need for REACH Only Representative coverage.

RoHS

The below substances listed in EU Directive 2015/863, also known as Restriction of Hazardous Substances (RoHS) 3, have not been intentionally added nor are they expected to be present in concentrations greater than the specified prohibited amounts in MG-Guard™ AO-168.

- Cadmium (<100 ppm, 0.01%)
- Lead (<1000 ppm, 0.1%)
- Mercury (<1000 ppm, 0.1%)
- Hexavalent chromium (<1000 ppm, 0.1%)
- Polybrominated biphenyls (PBB) (<1000 ppm, 0.1%)
- Polybrominated diphenyl ethers (PBDE) (<1000 ppm, 0.1%)
- Bis(2-ethylhexyl) phthalate (DEHP) (<1000 ppm, 0.1%)
- Butyl benzyl phthalate (BBP) (<1000 ppm, 0.1%)
- Dibutyl phthalate (DBP) (<1000 ppm, 0.1%)
- Diisobutyl phthalate (DIBP) (<1000 ppm, 0.1%)

SUBSTANCES OF VERY HIGH CONCERN (SVHC)

None of the substances contained in the Candidate List of Substances of Very High Concern (SVHC) as of January 19, 2021, are intentionally used nor added in the manufacture of MG-Guard™ AO-168.

Because the presence of the substances in the Candidate List are not expected under normal conditions, the absence has not been checked by tests.

DISCLAIMER

The information contained in this document is based upon data obtained from the manufacturer. This information is offered only as a guide to the handling of this specific material and conditions. The use and handling of this material may require alternate and additional considerations. No representation or warranty of any kind whatsoever is given or implied by Barentz North America LLC with respect to any information contained herein. In no event or circumstance shall Barentz North America LLC be liable for any damages, losses, liabilities or injuries of any kind whatsoever arising from any information contained herein including, without limitation, all indirect, special or consequential damages or losses which may result from the information contained herein.