

REACH SQ

BYK Standard Questionnaire for REACH Communication

Product: DISPERBYK®-2159

We can state that the product complies with Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).

In compliance with REACH means that all substances contained in this product:

- Have been pre-registered and/or have been registered by our company and/or our suppliers, and/or
- Are excluded from the Regulation, and/or
- Exempted from registration.

- For polymeric substances: all monomers have been pre-registered and/or have been registered by our company and/or our suppliers.

As a chemical company, it is our obligation to ensure the global compliance of our products. In order to fulfil our REACH obligations for our products we are in close contact with our suppliers to ascertain that all raw materials used within the European Economic area fulfil the requirements of the European regulation.

This information is also made available for our customers down the supply chain by our REACH SQ documents to further support them in assuring their REACH compliance. In case you cannot find the product, you would like to get information on, please contact brief.byk@altana.com.

Please be aware that the information contained in the REACH SQ document is only applicable for products purchased from BYK plants and warehouses within the European Economic Area. If you are a customer located outside the EU and would like to import our products, please have a look at the REACH OR brochure and contact ReachOR.BYK@altana.com for further questions.

BRIEF Team
BYK-Chemie GmbH

BRIEF.byk@altana.com

Part I Questions from Downstream User (Customer) to Supplier
REACH: Pre-registration / Registration^{1,2}

Concerning the product (trade name): DISPERBYK®-2159

- | | |
|---|----------------------------------|
| ☐ Substance | ☐ Polymer |
| ☒ Preparation | ☐ Article |

Are the substances contained in the product above and require registration, **pre-registered** by your company or by your upstream supplier?

- ☒ Yes, substances in this product manufactured by BYK > 1 ton per annum have been pre-registered by BYK
- ☒ Yes, all other substances, > 1 ton per annum not manufactured by BYK either have been pre-registered by BYK or BYK's suppliers and/or by their suppliers (producers/ importers) or are excluded or exempted from REACH.
- ☐ No
- ☐ Too early to decide. Reply probably by (expected date of reply)
- ☐ This product does not contain any substances manufactured by BYK that are subject to pre-registration under REACH

At this stage, do you expect that the substances, which are contained in the product above and require registration, will be **registered**?

- ☒ Yes²
- ☐ No
- ☐ Too early to decide. Reply probably by (expected date of reply)
- ☐ This product does not contain any substances manufactured by BYK that are subject to pre-registration under REACH

If questions 1 or 2 are answered with "yes": Regarding the substances that are contained in the product and require registration – please mark the crucial REACH registration deadlines for those substances, which are decisive for the product properties. This date only applies to substances manufactured by BYK:

- ☐ Immediate registration
- ☐ 2010
- ☐ 2013
- ☒ 2018
- ☐ Too early to decide
- ☐ Exempt from REACH
- ☐ This product does not contain any substances manufactured by BYK

¹ The information contained in this questionnaire expresses only the intention of the questionnee and does not constitute a bending obligation. Whilst the information is provided in utmost good faith, no representations or warranties are made with regards to its completeness or accuracy and no liability will be accepted for damages of any nature whatsoever resulting from the use of or reliance on the information.

² According to the statement concerning future availability, see page 3..

Contact details

(Please provide full contact details for the person in your company responsible for REACH issues):

BRIEF Team

BYK-Chemie GmbH

BRIEF.byk@altana.com

Statement concerning future availability

- BYK has expressed a firm commitment to sustain the entire sales products portfolio under the obligations of REACH;
- At present BYK cannot formally guarantee that indeed all individual products will be sustained under all circumstances.

Further comments

- Please be so kind to understand that it is not our policy to release compositions of our products since we consider these compositions as our intellectual property;
- According to the recommendations from the chemical industry associations (see letter to this effect on our website www.byk.com/REACH) we do not communicate pre-registration numbers;
- According to the recommendations from the chemical industry associations (see letter to this effect on our website www.byk.com/REACH) we ask you not to communicate your intended uses to us at this stage;
- For any questions or comments, please write to our dedicated e-mail address: brief.byk@altana.com.

Part I Explanations

Question 1 and Question 2:

If the supplier is not the Manufacturer/Importer but the distributor of substances requiring registration that are contained in the listed products above, it must be clarified whether the supplier can assume that his upstream Manufacturer/Importer will carry out a pre-registration.

If the product is a polymer, the purpose of the question is to find out whether the monomers bound in the polymer or other substances bound in the polymer will be registered by the Manufacturer/Importer. This does not refer to residual monomers in the polymer.

Somewhat more time might be needed to answer this question for preparations, because initially the supplier needs to obtain relevant information from his suppliers up till and including the manufacturer/importer. Answering this question with "yes" is no promise of a registration, as – besides REACH – further factors might exert an influence (e.g. unforeseeable future market situations).

Question 3:

Example – Determining the crucial registration deadline for substances decisive for product properties: A product consists of substances 1, 2 and 3. Substances 1 and 2 are decisive for the product properties; they have registration deadlines of 6, 6 and 11 years due to their production or import volumes. Substance 3 – which is not decisive for the specific use of the product and could be replaced, e.g. a solvent – has a registration deadline of 3.5 years because of higher production or import volumes. In this example, substance 3 is not crucial for the product as it can be replaced without affecting the required product properties. Here, substances 2 and 3 are decisive so that the box "6 years" should be ticked. Box "6 years" should be ticked.

The option "immediate registration" means that there is no pre-registration and the substance will be registered without delay, within 12 months after the entry into force of REACH.

The information herein is based on our present knowledge and experience. The information merely describes the properties of our products but no guarantee of properties in the legal sense shall be implied. We recommend testing our products as to their suitability for your envisaged purpose prior to use. No warranties of any kind, either express or implied, including warranties of merchantability or fitness for a particular purpose, are made regarding any products mentioned herein and data or information set forth, or that such products, data or information may be used without infringing intellectual property rights of third parties. We reserve the right to make any changes according to technological progress or further developments.

BYK reserves the right to change or update the information without notice.