

SAMSØE SAMSØE

CHEMICAL POLICY &
RESTRICTED SUBSTANCE LIST

AUGUST 2026

1. PURPOSE

Samsøe Samsøe is committed to protecting our customers, partners, the environment, and the communities within which we operate from any consequence of harmful chemicals. We work continuously to ensure that all processes and products in our entire value chain meet recognised safety expectations and standards.

This policy establishes Samsøe Samsøe’s requirements for chemical management and defines the use of our Restricted Substance List (RSL), ensuring safe, responsible, and compliant chemical practices across our supply chain.

2. SCOPE

This policy applies to the entire Samsøe Samsøe value chain and all product categories. It applies to all suppliers, manufacturing partners, and Tier 1 partners, who are responsible for ensuring compliance across all subsequent tiers.

3. GUIDING PRINCIPLES AND STANDARDS

Our approach to chemical management is grounded in internationally recognised frameworks. We are aligned with and act in accordance with the following:

- EU chemical legislation, including REACH and Substances of Very High Concern (SVHC) requirements
- Updates and guidance issued by the European Chemicals Agency (ECHA)
- The AFIRM Group Restricted Substance List (RSL)

The Samsøe Samsøe RSL, developed based on AFIRM guidance, defines substance restrictions and thresholds for all products manufactured for Samsøe Samsøe.

Where our RSL sets stricter requirements than REACH/SVHC or other applicable legislation, our RSL shall apply. Where local laws or regulations impose stricter requirements, those shall take precedence.

We strongly encourage the use of certified materials to reduce environmental and health impacts across the supply chain.

4. POLICY STATEMENT

4.1. CHEMICAL COMPLIANCE REQUIREMENTS

All suppliers must comply with applicable EU and national chemical legislation, including REACH and SVHC regulations, and remain informed of updates issued by ECHA.

All suppliers must comply with the Samsøe Samsøe Restricted Substance List (RSL), which defines stricter thresholds than regulatory minimum requirements where applicable.

4.2. RESTRICTED SUBSTANCE LIST (RSL) APPLICATION

The RSL applies to all materials, components, and production inputs used in Samsøe Samsøe products, including textiles, accessories, packaging, and related materials.

Suppliers must ensure that all processes, materials, and products comply with the RSL throughout the entire production chain, including subcontractors and lower-tier suppliers.

4.3. TESTING AND NON-COMPLIANCE

Samsøe Samsøe reserves the right to conduct chemical testing at any stage of production, including seasonal testing of high-risk articles and random sampling.

In the event of non-compliance with the RSL, the supplier shall bear all associated costs, including but not limited to:

- Testing costs
- Replacement or reprocessing of non-compliant components
- Retesting until compliance is achieved
- Costs associated with product recalls or market withdrawal

5. ROLES AND RESPONSIBILITIES

Chemical compliance is the responsibility of every person at Samsøe Samsøe. The following describes how oversight and accountability are structured:

- CEO: Overall accountability for company compliance with legal and ethical standards
- Head of Sustainability (Policy Owner): Responsible for maintaining and updating this policy and ensuring alignment with regulatory and industry standards
- Sustainability and Production teams: Responsible for implementing, monitoring, and supporting chemical compliance processes, including supplier engagement and RSL management
- Leadership Team: Responsible for ensuring resources and operational alignment to support policy implementation
- All Employees: Responsible for understanding and adhering to relevant aspects of the policy in their roles

6. IMPLEMENTATION AND MONITORING

Samsøe Samsøe implements this policy through supplier onboarding requirements, compliance tracking, and regular chemical testing.

We carry out:

- Seasonal testing of identified risk articles
- Random sampling across product categories
- Ongoing monitoring of supplier compliance performance

Suppliers are expected to maintain documentation and processes demonstrating compliance with this policy at all times.

7. COMPLIANCE AND CONSEQUENCES

Non-compliance with this policy or the RSL is considered a breach of contractual obligations. In cases of non-compliance, Samsøe Samsøe may require corrective actions and impose financial responsibility on the supplier for all associated costs, including testing, remediation, replacement, retesting, and potential product recalls.

Repeated or severe violations may result in suspension or termination of the business relationship.

8. REPORTING

Suppliers and partners are required to proactively report any known or suspected non-compliance with the RSL or chemical requirements.

Samsøe Samsøe encourages open communication regarding chemical risks, incidents, or improvements in chemical management practices.

