



16 September 2025

To: Kodak Customers
From: Kodak HSE Product Stewardship Group

Re: **Product Stewardship for Kodak Products**

This document provides general information about environmental and sustainability requirements regarding our products and the substances in them, which are either subject to current legal restrictions or are of interest to our customers. The information provided below is generic for the hundreds of products sold by Kodak globally.

Regulatory Documentation

Given ever-changing regulatory and customer requirements combined with Kodak's efforts to use alternative materials in select applications, we recommend that if you are seeking specific information about a product, please refer to the Safety Data Sheet (SDS), Article Information Sheet (AIS), Technical Data Sheet (TDS) and/or specific Kodak declaration statements (if available).

For more information on Kodak Safety Data Sheets (SDS) for chemical products and Article Information Sheets (AIS) please visit the [website](#).

Please note that KODAK Plates, KODAK Equipment and Film do not require a SDS because under normal conditions these products do not pose a physical hazard or health risk.

In the event you have searched for a SDS and could not locate the information, please review the information below. Inquiries can be sent to us-pep@kodak.com.

Compliance with EU and UK REACH (Regulation EC No 1907/2006)

Kodak is fully aware of EU REACH, the European Union Regulation (EC No 1907/2006) concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals that entered into force on June 1st, 2007, as well as the UK's implementation of REACH which entered into force January 1st, 2021. Kodak has dedicated programs and resources to deal with legislative requirements and business continuity concerns related to EU and UK REACH.

REACH Registration Obligations

Kodak ensures that substances in each chemical product on the EU and UK market have been REACH registered within our supply chain or exempt from such registrations. Please note that many substances do not and will not have registration numbers listed in the SDS. This may be for any one of a variety of reasons and the SDS remains compliant.

REACH Authorisations (Annex XIV)

Kodak regularly reviews the REACH Authorisation List (Annex XIV). None of our products currently are in scope of any REACH Authorisations.

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REACH Restrictions (Annex XVII)

Kodak regularly reviews the REACH Restriction List (Annex XVII). Restrictions are normally used to limit or ban the manufacture, placing on the market (including imports) or use of a substance, but can impose any relevant condition, such as requiring technical measures or specific labels. For chemical products, any applicable information relating to REACH restrictions are mentioned in our REACH compliant Safety Data Sheets (SDSs). If you have questions regarding specific products, applications or potential impact of restrictions, please contact your Kodak Sales representative or email us at productstewardship@kodak.com

REACH Candidate List of Substances of Very High Concern (SVHCs)

Kodak regularly reviews the Candidate List of Substances of Very High Concern. Kodak maintains a website containing a list of articles containing SVHCs greater than or equal to 0.1% ([See Product Declarations page](#)). For chemical products, any applicable information relating to SVHCs are mentioned in our REACH compliant SDSs. Please visit www.kodak.com/go/sds to download the latest version of the SDS.

Compliance with Toxic Substances Control Act (TSCA)

Kodak complies with the Toxic Substances Control Act (TSCA), a U.S. law enacted in 1976 and administered by the Environmental Protection Agency (EPA). TSCA regulates the manufacture, import, distribution, and use of chemical substances and mixtures.

We ensure that:

- All chemical substances in our products are either listed on the TSCA Inventory or are exempt from listing.
- Any new chemical substances or significant new uses undergo EPA review and approval, in accordance with TSCA Section 5 requirements.
- We adhere to restrictions and prohibitions outlined in TSCA Section 6, and any relevant information is disclosed in our Safety Data Sheets (SDSs).
- We comply with TSCA Section 8 by maintaining accurate records and fulfilling reporting obligations as required.

For additional information on TSCA compliance, please contact productstewardship@kodak.com.

Compliance with PFAS

We regularly assess our use of Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) against current regulations and are currently preparing for future requirements to responsibly manage these substances. We are going beyond the currently regulated PFAS and proactively working to query our supply base for all PFAS substances and rollup the presence of these substances across our available product range.

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Compliance with Conflict Minerals Policies

As part of our global program for Supplier Environmental and Social Responsibility, Kodak is committed to the ethical sourcing of minerals used in our products. Kodak strictly opposes the use of minerals revenue to fund or in any way foster ongoing conflict in conflict-affected or high risk areas and is committed to supporting efforts that address the funding and root causes of this conflict.

As defined by the US SEC and EU 2017/821,

Conflict Minerals are:

- Columbite-tantalite, used to produce Tantalum,
- Cassiterite, the ore used to produce Tin,
- Wolframite, the source of the element Tungsten, and
- Gold

Kodak works diligently with our suppliers and other stakeholders to identify whether Conflict Minerals are being sourced for potential used in Kodak products. The global supply chain for these minerals is complex, and tracing the minerals in our products to their source is a challenge. Kodak's objective is to work with its suppliers to establish the necessary proactive due-diligence programs that will enable greater long term supply chain transparency.

For further information on Kodak's Conflict Minerals program, please refer to Kodak's [Conflict Minerals Policy](#) or contact kodakconflictminerals@kodak.com.

Sustainability and ESG at Kodak

With a focus on print and advanced materials and chemicals, Kodak strives to deliver innovative products and solutions that care for people and the planet and fuel sustainable growth for Kodak and our customers. Kodak actively drives technological developments to enable commercial and packaging printers to produce in a greener way and leave a smaller carbon footprint.

Kodak is committed to providing a transparent disclosure of our sustainability goals and performance metrics for our stakeholders. As such, we continually evaluate the best methods and frameworks for engaging our stakeholders, including customers, employees, investors, and the communities where we operate.

Our sustainability strategy is based on three pillars: one people, one planet and one business. Together these form One Kodak, a transformation bringing our priorities as a company together as a whole.

The UNSDGs were one of the inputs used to inform our sustainability priorities and goals. While Kodak has not yet developed a separate UNSDG framework, our sustainability report highlights our work in several key areas of the UNSDGs, including diversity, equity and inclusion (SDG 5), clean energy (SDG 7) and responsible consumption and production (SDG 12).

Regarding Kodak's activities on ESG please visit [Sustainability | Kodak](#). More information can be found in our annual Corporate Sustainability Report.

For information on our ESG goals and targets visit [Sustainability Goals | Kodak](#).

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Health, Safety and Environmental Management System

Kodak is committed to meeting or exceeding the environmental, health and safety expectations of our neighbours and the communities in which we operate. Through a system of goal setting and performance tracking, Kodak strives for operational improvements in priority areas such as climate change.

Our worldwide sites adhere to the stringent quality and environmental management system requirements set by the International Standards Organization.

For information on our ISO certificates visit [HSE ISO Certificates](#).

Our Commitment

Kodak remains dedicated to rigorous regulatory compliance and scientific precision, delivering products that meet and exceed your expectations for quality and safety.

If you have questions regarding specific products or applications, please contact your Kodak Sales representative or email us at productstewardship@kodak.com.

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APPENDIX I - SUBSTANCES IN KODAK PRODUCTS

Assessment on Batteries
Please contact Strand Europe at www.kodakbatteries.strandeurope.com

Assessment on California Proposition 65 substances	
<p>Proposition 65 (or Prop 65), officially known as the Safe Drinking Water and Toxic Enforcement Act of 1986, was enacted as a ballot initiative in California (USA) in November 1986. Prop 65 is intended to enable Californians to make informed decisions about their exposures to chemicals in products they purchase, in their homes or workplaces and in the environment largely by requiring businesses to provide warnings about significant exposures to designated chemicals.</p> <p>Proposition 65 requires the state of California to maintain a list of chemicals known to the State to cause cancer or reproductive toxicity. The Office of Environmental Health Hazard Assessment (OEHHA) administers the Prop 65 program (further information on Proposition 65 - OEHHA (ca.gov)). This list, which is updated at least once a year, has grown to include over 900 chemicals since it was first published in 1987. Prop 65 requires adequate warning labels to be provided on products containing any of the chemicals from the previously mentioned list with significant risk of exposure</p>	
Substances	Use of substances in Kodak products
CA Prop 65	<p>Kodak products are not considered consumer products and therefore do not require a product label per Proposition 65 legislation.</p> <p>Kodak safety data sheets are compliant with Proposition 65. In addition to meeting the requirements of the Hazard Communication Standard (HCS), Kodak products which contain a Prop 65 listed chemical use an appropriate statement in Section 11 of the SDS to inform the user.</p>

Assessment on EU REACH SVHCs	
<p>We are monitoring the bi-yearly additions of Substances of Very High Concern (SVHC) to the Candidate List, which is the first step of the REACH Authorisation procedure. Please visit the ECHA website for the most up to date official version of the Candidate list: https://echa.europa.eu/candidate-list-table.</p>	
Substances	Use of substances in Kodak products
REACH Substances of Very High Concern	<ul style="list-style-type: none">• The REACH Article 33 Declarations (PDF) document identifies Kodak consumable articles that may contain substances on the European Chemical Agency Candidate List at concentrations greater than 0.1% (wt/wt).• All other consumable articles have no known substances on the Candidate List at concentrations greater than 0.1% (wt/wt).• For chemical products, any applicable information relating to SVHCs are mentioned in our REACH compliant SDSs.

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Assessment on EU RoHS

Since 2003, EU laws have restricted the use of certain hazardous substances in Electrical and Electronic Equipment (EEE) through the RoHS Directive. On 21 July 2011, Directive 2011/65/EU (RoHS 2) entered into force and came into effect on 3 January 2013, repealing Directive 2002/95/EC (RoHS 1). RoHS 2, in its expanded scope (covering 11 EEE categories), phased in the previously excluded categories of medical devices and monitoring & control instruments, as well as certain cables.

RoHS 2 initially restricted the same 6 hazardous substances with the same maximum concentration limits as RoHS 1: lead [Pb] (0.1%), mercury [Hg] (0.1%), cadmium [Cd] (0.01%), hexavalent chromium [CrVI] (0.1%), polybrominated biphenyls [PBB] (0.1%) and polybrominated diphenyl ethers [PBDE] (0.1%). On 24 June 2015, Delegated Directive 2015/863 entered into force adding 4 new substance restrictions to Annex II of RoHS 2: bis(2-ethylhexyl)phthalate [DEHP] (0.1%), butyl benzyl phthalate [BBP] (0.1%), dibutyl phthalate [DBP] (0.1%) and diisobutyl phthalate [DIBP] (0.1%).

RoHS 2 allows for exemptions (Annexes III & IV) for specific materials or components, but these exemptions are limited in scope and duration to encourage the development of safer alternatives. When an exemption is reaching its expiry date, industry stakeholders can apply for its renewal. An "industry stakeholder refers to any party with a vested interest in the manufacturing, distribution, regulation, or usage of EEE within the scope of the RoHS regulations.

Large-scale stationary industrial tools (LSSIT) are excluded from the scope of the EU Directive 2011/65 on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS) per Article 2.4.d, and of the EU Directive 2012/19 on waste electrical and electronic equipment (WEEE) per Article 2.4.b. Based on definitions provided in the EU WEEE and RoHS directives and interpretations provided in the EU RoHS 2 FAQ (to which the EU WEEE FAQ refers), Kodak commercial inkjet (Versamark, Prosper), electrophotographic (NexPress, Digimaster) printing presses, offset computer-to-plate (CTP) platesetters (Trendsetter, Achieve, Magnus), flexographic film/plate imagers (Flexcel NX) and plateline equipment (T-HDE, T-HDX, T-MDE, LIBRA P-HD, MERCURY P-HD) are LSSIT.

Substances	Use of substances in Kodak products
EU RoHS	<p>Most Kodak products are chemicals and thus do not fall in scope of the Electrical and Electronic Equipment (EEE) definition.</p> <p>For Kodak Commercial Imaging machinery / equipment and their components (or spare parts), with or without printing functions, that are LSSIT or specifically designed for use in LSSIT, the EU RoHS and WEEE directives <u>do not apply</u>.</p> <p>For more information on Kodak products regarding EU RoHS, please contact productstewardship@kodak.com.</p>

Assessment on Volatile Organic Compounds (VOCs)

Under the EU Directive 2010/75/EU, 'volatile organic compound' (VOC) means any organic compound as well as the fraction of creosote, having at 293.15 K (20 C) a vapour pressure of 0.01 kPa or more, or having a corresponding volatility under the particular conditions of use.

Substances	Use of substances in Kodak products
Volatile Organic Compounds (VOCs)	<p>For more information on Kodak products regarding VOCs, please contact productstewardship@kodak.com</p>

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Assessment on Persistent Organic Pollutants (POPs)	
<p>Persistent organic pollutants (POPs) are organic substances that persist in the environment, accumulate in living organisms and pose a risk to our health and the environment.</p> <p>POPs are regulated worldwide by the Stockholm Convention and the Aarhus Protocol. These international treaties are implemented in the European Union by the POPs Regulation.</p> <p>The POPs Regulation aims to protect human health and the environment with specific control measures that:</p> <ul style="list-style-type: none">• prohibit or severely restrict the production, placing on the market and use of POPs;• minimise the environmental release of POPs that are formed as industrial by-products;• make sure that stockpiles of restricted POPs are safely managed; and• ensure the environmentally sound disposal of waste consisting of, or contaminated by POPs. <p>Chemical substances that have been identified as POPs include:</p> <ul style="list-style-type: none">• pesticides (such as DDT);• industrial chemicals (such as polychlorinated biphenyls, which were widely used in electrical equipment); or• unintentional by-products formed during industrial processes, degradation or combustion (such as dioxins and furans). <p>Stockholm Convention – Covering PFOS (perfluorooctane sulfonic acid), PFOA (perfluorooctanoic acid), and PFHxS (perfluorohexane sulfonic acid); LC-PFCAs (long-chain perfluorocarboxylic acids) under evaluation.</p> <p>EU POPs Regulation – Implements the bans and restrictions of the Stockholm Convention.</p>	
Substances	Use of substances in Kodak products
Persistent Organic Pollutants (POPs)	For more information on Kodak products regarding POPs, please contact productstewardship@kodak.com

Assessment on TSCA 5 Persistent, Bioaccumulative and Toxic (PBT) substances	
<p>As per Jan 6, 2021, 5 Persistent, Bioaccumulative and Toxic (PBT) substances are restricted under TSCA are:</p> <ul style="list-style-type: none">• PIP 3:1- Phenol, isopropylated phosphate• DecaBDE- Decabromodiphenyl ether• HCBd – Hexachlorobutadiene• PCTP – Pentachlorothiophenol• 2,4,6- TTBP – 2,4,6-tris(tert-butyl) phenol	
Substances	Use of substances in Kodak products
TSCA 5 PBTs	<p>All Kodak chemicals have been assessed and do not include any intentionally added TSCA PBTs</p> <p>PIP 3:1 and DecaBDE, are commonly seen in electronic equipment.</p> <p>For more information on Kodak Equipment products please contact productstewardship@kodak.com</p>

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