



**Kodak Health, Safety, and Environmental (HSE)  
Supplier Requirements**

*For Articles, Chemicals, Electrical and Electronic Equipment, and Packaging*

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## 1. Purpose

Eastman Kodak Company (Kodak) requires that products supplied to Kodak meet all applicable regulatory compliance requirements during manufacture, global distribution, and sale. Additionally, Kodak has established internal standards that go beyond compliance to reduce the environmental impact of our products. These requirements are included in this document.

Suppliers are required to conform to the requirements in **EKSP-2285 Kodak Health, Safety, and Environmental (HSE) Supplier Requirements for Articles, Chemicals, Electrical and Electronic Equipment, and Packaging** (formally known as *Kodak Health, Safety, and Environmental (HSE) Specifications for Products, Parts and Packaging*). If more recent regulatory compliance requirements are in force, Kodak requires that the supplier meet these requirements. From time to time, other documentation may also be used to communicate specific requirements as required by Kodak businesses.

This document is revised periodically. The current version of **EKSP-2285** can be found at [www.kodak.com/go/hsesupplier](http://www.kodak.com/go/hsesupplier).

## 2. Scope

As Kodak is a global company, **EKSP-2285** applies to all products supplied or licensed to Kodak regardless of production or source location. Requirements apply to Kodak and non-Kodak branded products and are based on the type of product. **EKSP-2285** specifies HSE requirements for the following types of products:

- [Articles](#)
- [Chemicals](#)
- [Electrical and Electronic Equipment](#)
- [Packaging](#)

## 3. Supplier Responsibilities

### 3.1. Manufacturing/Export Approvals:

The supplier shall obtain and maintain any necessary approvals and authorizations from regulatory agencies and other government organizations to manufacture in and export from their country of manufacture.

### 3.2. Conformance Documentation:

The supplier is to complete either Kodak's HSE Supplier Declaration Form (DF) or respond to authorized third-party requests for conformance information.

Instructions for completing a DF can be obtained on Kodak's website at: [www.kodak.com/go/hsesupplier](http://www.kodak.com/go/hsesupplier). If Kodak or an authorized third party acting on behalf of

Kodak makes a request for a DF, the supplier shall respond within 15 business days or such commercially reasonable shorter period as specific in the request.

### **3.3. Expectation Regarding Second and Third Tier Suppliers:**

The supplier shall have a due diligence process for contacting their suppliers to ensure accurate and complete information is provided to Kodak. Documentation and/or test data, including documentation and data from the supplier's supply chain, shall be kept on file and made available upon request by Kodak.

### **3.4. Change Management:**

The supplier shall promptly notify Kodak, by sending an email to [ww-mcd@kodak.com](mailto:ww-mcd@kodak.com) and copying their Kodak Procurement contact whenever product, process, material, or regulatory changes result in changes to the DF that has been previously submitted.

### **3.5. Product Changes, Discontinuance, Recalls, or Non-Conformance:**

The supplier is obligated to promptly communicate in writing to Kodak at [ww-mcd@kodak.com](mailto:ww-mcd@kodak.com) any changes, discontinuance, recalls, or non-conformance that could impact the safety, health, or environmental performance of a Kodak product.

If potential safety, health, environmental, or regulatory issues are discovered by Kodak or Kodak's customers, which are determined to be the supplier's responsibility, the supplier will be notified in writing. The supplier shall address the concern in writing within 15 business days from the date of all such notifications or such commercially reasonable shorter period as may be set forth in the notice.

### **3.6. Additional Information:**

Suppliers shall promptly provide Kodak with documentation to verify compliance with EKSP-2285 requirements or additional requirements identified in regulatory compliance guideline documents or other documents upon request. This includes, but is not limited to:

- Documentation to satisfy Kodak's reporting requirements
- Special applications, material composition or marking requirements (e.g., food contact applications)
- Regional regulatory compliance and product labeling requirements

### **3.7. General Requirements for Articles, Chemicals, Electrical and Electronic Equipment (EEE), and Packaging:**

Note: The following requirements for [Articles](#), [Chemicals](#), [Electrical and Electronic Equipment \(EEE\)](#), and [Packaging](#) are in addition to the requirements outlined in Section 5-8 for the individual product types.

- 3.7.1. Restricted Materials:** [Appendix A](#) identifies restricted and declarable substances/substance groups and the criteria suppliers shall use to evaluate each

component of the supplied product, as well as [reportable applications](#) and [threshold levels](#).

Unless Kodak has confirmed acceptability for use and provided written permission to a supplier, products shall not contain restricted substances above the prescribed thresholds for the declarable applications listed in [Appendix A](#).

**3.7.2. Emissions from Products:** Suppliers shall identify airborne emissions that may be generated/emitted during normal conditions of use or foreseeable misuse (e.g., volatile organic compounds, carbon black, ozone, styrene, objectionable odors, and dust). Certificates, test reports, and supporting documentation shall be provided upon request.

**3.7.3. EU REACH Substances of Very High Concern (SVHCs):** Suppliers are required to declare all SVHCs present at greater than 0.1 % by weight in products supplied to Kodak ([Appendix A](#)). Suppliers shall also review updates to the list of SVHCs and promptly inform Kodak at [ww-mcd@kodak.com](mailto:ww-mcd@kodak.com) if a newly added material is present in the items provided to Kodak at greater than 0.1 % by weight.

Suppliers of equipment products and components for which Kodak uses an authorized third-party to gather conformance information shall promptly respond to requests on an ongoing basis as the EU REACH SVHC list is updated.

**3.7.4. Product Safety (PS):** Products supplied to Kodak shall conform to all applicable Product Safety (PS) standards appropriate for intended markets. Examples include Flammability (UL-94), Toy Safety (ASTM F963, EN-71), or Food Contact. Certificates, test reports, and supporting documentation shall be promptly provided upon request.

**3.7.5. Paper and Printed Materials:** Paper and printed materials (including manuals and stuffer sheets) shall contain a minimum of 10 % [recycled content](#) OR be certified by one of the following forest certification schemes:

- Any national certification system that has been endorsed by PEFC (Programme for the Endorsement of Forest Certification), e.g., Sustainable Forestry Initiative (United States) and PEFC Canada.
- The Forest Stewardship Council.

**3.7.6. Packaging:** Suppliers are required to meet all applicable [Packaging Requirements](#) for packaging components used in products supplied to Kodak.

## 4. Ethical Requirements

### 4.1. Conflict Minerals:

Kodak is committed to ethical and responsible [conflict minerals](#) sourcing in compliance with the Dodd-Frank Act, EU Conflict Minerals Regulation 2017/821, OECD Due Diligence Guidance, and industry best practices. To ensure compliance and prevent sourcing from the Democratic Republic of Congo (DRC) and its surrounding countries

(Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia) and [conflict-affected and high-risk areas](#) (CAHRAs), when requested, suppliers to Kodak are expected to: have a conflict minerals policy, a [due diligence management system](#), and annually return the requested Conflict Minerals Reporting Template (CMRT) to [kodakconflictminerals@kodak.com](mailto:kodakconflictminerals@kodak.com).

Kodak regards this program as a total supply chain initiative; therefore, we require our suppliers, including distributors, to pass these expectations to their suppliers to ensure conformance throughout the supply chain. Kodak will internally assess suppliers based on the strength of their programs, aligning with the principles outlined in the OECD Due Diligence Guidance. If a supplier fails to cooperate in implementing corrective measures and/or does not meet compliance standards, Kodak reserves the right to take appropriate actions, including discontinuing purchases from the supplier.

#### **4.2. Animal and Plant Derived Materials:**

- 4.2.1. Suppliers shall declare all animal and plant derived materials with documentation of the source.
- 4.2.2. Products shall not be produced using materials from any plant or animal species classified as endangered or threatened under the [Convention on International Trade in Endangered Species of Wild Fauna and Flora \(CITES I, II, III\)](#), the [International Union for Conservation of Nature \(IUCN\) Red List of Threatened Species™](#), and the [Endangered Species Act \(ESA\)](#).
- 4.2.3. Kodak requires that any materials sourced from farm-raised animals adhere to [The Five Freedoms](#).

#### **4.3. Forced Labor and Supply Chain Due Diligence:**

- 4.3.1. Suppliers shall comply with all applicable laws on human rights, labor and social standards of the United Nations, the European Union, the United States of America, the United Kingdom, and other countries worldwide in its global business operations. Examples include but are not limited to the UK Modern Slavery Act, US Uyghur Forced Labor Prevention Act (UFLPA), and Mexico's Forced Labor Import Ban.
- 4.3.2. Suppliers shall comply with all applicable laws on supply chain due diligence and transparency. Examples include but are not limited to the California Transparency in Supply Chains Act, US Uyghur Forced Labor Prevention Act (UFLPA), UK Modern Slavery Act, the German Supply Chain Due Diligence Act and Australia's Modern Slavery Act.

### **5. Article Requirements**

The supplier shall evaluate compliance with the [Article](#) Requirements as well as the [General Requirements for Articles, Chemicals, Electrical and Electronic Equipment \(EEE\), and Packaging](#).

#### **5.1. Proposition 65:**

Suppliers shall declare when labeling is required in the state of California, per the California State Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65). Suppliers of consumer products shall provide Kodak with a product that does not require a California Proposition 65 label, unless approved in writing in advance by Kodak. The Proposition 65 list contains over 1,000 chemicals, including lead, mercury, phthalates, PCBs, and DEHP, and can be found at [The Proposition 65 List - OEHHA \(ca.gov\)](#).

## 5.2. EU Deforestation Regulation (EU) 2023/1115

Articles made from natural rubber and under the scope of the products listed in Annex I of Regulation (EU) 2023/1115 shall be:

- Deforestation-free
- Produced in accordance with the relevant legislation of the country of production.
- Covered by a due diligence statement.

Prior to supplying, suppliers shall provide Kodak with the information outlined in Article 9 of EU 2023/1115 to allow the necessary due diligence checks to be carried out.

## 5.3. Chemicals Released from Articles during Foreseeable Use:

Suppliers are required to meet all [Chemical Requirements](#).

## 6. Chemical Requirements

The supplier shall evaluate compliance with the [Chemical Requirements](#) as well as the [General Requirements for Articles, Chemicals, Electrical and Electronic Equipment \(EEE\), and Packaging](#).

### 6.1. Safety Data Sheets (SDS):

Suppliers are required to provide an SDS for chemicals, solutions, or mixtures to HSE at [ww-sds@kodak.com](mailto:ww-sds@kodak.com) and the Kodak purchasing representative at time of supply. The SDS shall comply with applicable provisions of GHS (Globally Harmonized System of Classification and Labeling of Chemicals), or the comparable regulation for the country where the material is transported. The SDS shall be provided in English and in the official languages of all countries to which it is supplied. At least one EU SDS should be provided (Germany is preferred.)

### 6.2. Global Inventory Status:

Suppliers are required to declare the status of chemicals (including those in solutions, mixtures or released from articles during foreseeable use) regarding chemical registration and premanufacture notification requirements in those countries that have enacted such requirements. Countries and regions having chemical control regulations include, but are not limited to, Australia (AICS), Canada (DSL/NDSL), China (IECSC), European Union (EINECS), Japan (ENCS), Korea (ECL), New Zealand (NZIoC),

Philippines (PICCS), Province of Ontario, Switzerland, Taiwan, Turkey, and United States (TSCA).

### 6.3. REACH:

To assist Kodak in meeting requirements under European Union REACH Regulation (EC) No. 1907/2006, suppliers are required to promptly provide the following information:

- Identify whether the chemical is manufactured in the EU
- Identify whether supplier has pre-registered or registered the chemical
- Identify if the chemical is exempt from reporting (and if so, why)

Indicate if supplier's Only Representative (OR) will agree to include Kodak volume/use should Kodak have applicable reporting requirements for the chemical. To assist Kodak in meeting REACH-like requirements in other countries such as Korea and Turkey, suppliers are required to promptly provide additional information upon request.

## 7. Electrical and Electronic Equipment (EEE) Requirements

The supplier shall evaluate compliance with the [EEE Requirements](#) as well as the [General Requirements for Articles, Chemicals, Electrical and Electronic Equipment \(EEE\), and Packaging](#).

### 7.1. Traceability Requirements for Difficult-to-Identity Components:

Suppliers providing plastics, foam, wire harnesses, circuit boards and safety labels shall meet the traceability requirements in accordance with [Appendix B](#) unless advised otherwise. Meeting these traceability requirements will demonstrate to regulatory inspectors that the material and/or part is identical to or equivalent to what is listed in the agency's product safety inspection report.

### 7.2. Batteries:

Batteries shall comply with EU Battery Directive 2006/66/EC and EU Battery Regulation 2023/1542. When requested, suppliers shall provide Kodak with the following battery information including, but not limited to:

- The number and weight of embedded or non-embedded batteries shipped with the product
- Battery chemistry
- IEC and ANSI Designations (e.g. R03 and 24)
- Form factor (shape)
- Voltage
- Whether primary (non-rechargeable) or secondary (rechargeable)
- Transportation classification
- Safety Data Sheet (SDS)
- Test reports and/or certifications (e.g., CE Mark, UL NRTL Mark, UN Transportation Safety Test Certificate, Korea Product Safety Testing Certificate)

### 7.3. Finished Commercial Electrical and Electronic Equipment (EEE) Requirements:

Finished EEE includes, but is not limited to, standalone printers, presses, platesetters, plate processors, plate stackers, scanners, workstations, and external power supplies. Regulatory compliance guideline documents or other documents may be used to communicate the intended countries of sale so that applicable regulatory compliance requirements, marks, or statements are placed on the product and/or data plate and the required documentation is delivered with the equipment. For example: serialized EU Declaration of Conformity applicable for EEE in scope of the Machinery Directive.

- 7.3.1. Product Safety (PS):** EEE shall comply with applicable US or EU Product Safety standards when there are no country specific regulatory requirements. Otherwise, EEE shall comply with all applicable Product Safety standards and workplace safety requirements for the intended markets (e.g., UL, CSA, IEC/EN, ASTM standards and EU Product Safety Directives). To ensure applicable PS standards are met, suppliers shall disclose to Kodak if wireless or laser technology is used. Certificates, test reports and supporting documentation shall be provided for all regions and/or countries in which the supplier has approval to market upon request.
- Manuals or guides shall be provided which identify appropriate preventative and protective measures to be employed to mitigate risk to customers and service personnel during installation, use and service.
  - Safety instructions and safety labels shall be provided in at least one of the official languages for the intended markets.
  - Regulatory compliance guideline documents or other documents for specific products may contain additional requirements. Suppliers are expected to meet all equipment regulatory requirements for the specified markets in which the equipment will be placed.
- 7.3.2. Electromagnetic Compatibility (EMC):** EEE shall comply with applicable US FCC or EU EMC Directive / standards when there are no country specific regulatory requirements. Otherwise, EEE shall comply with all applicable Electromagnetic Compatibility (EMC) requirements for the intended markets (e.g., FCC for US&C, RCM Mark for AU&NZ, KC Mark for Korea, and CE mark / EU EMC Directive for EU). To ensure applicable EMC standards are met, the supplier shall disclose to Kodak if wireless or other ionizing / non-ionizing emitter technology is used. Certificates, test reports and supporting documentation shall be provided upon request for all countries in which the supplier has approval to market.
- Regulatory compliance guideline documents or other documents for specific products may contain additional requirements. Suppliers are expected to meet all equipment regulatory requirements for the specified markets in which the equipment will be placed.
- 7.3.3. Sound Level:** Products shall conform to the following sound pressure levels:
- General office systems shall be less than 70 dB(A).
  - Per Kodak Requirement, large professional operating systems shall be less than 80 dB(A) at workstations where operators will be continuously exposed. Kodak bases full shift exposure levels on an 8-hour workday. Based upon the OSHA Permissible Exposure Limit of 90 dBA as an 8-hr TWA or the Hearing



Conservation Action Level of 85 dBA as an 8-hr TWA, each increase in 5 dBA decreases allowable exposure time by one half (e.g. 8 hours to 4 hours).

- 7.3.4. Energy Efficiency:** Products shall conform to all applicable energy efficiency regulations including testing, labelling and registrations applicable to the equipment type and the intended markets. (e.g., DOE for US, NRcan for Canada, EU Directive 2009/125/EC for EU, K-MEPS for Korea).

## 8. Packaging Requirements

The supplier shall evaluate compliance with the [Packaging](#) Requirements as well as the [General Requirements for Articles, Chemicals, Electrical and Electronic Equipment \(EEE\), and Packaging](#).

### 8.1. Environmental Impact:

Packaging materials supplied to Kodak shall be designed and manufactured such that:

- Their volume and weight are limited to the minimum adequate to maintain the appropriate and necessary level of safety and hygiene for concerned packed products.
- They are re-usable or easily recyclable, or at least recoverable in the form of energy recovery.
- They contain, as much as possible, recycled materials

### 8.2. Marking of Packaging Materials:

All packaging shall bear the appropriate marking either on the packaging itself or on the label, as defined by the EU identification system for packaging material 97/129/EC. Exceptions include metalized films and laminates, shrink wrap, foams and materials that have dimensions or color that make marking impractical.

### 8.3. Plastic Packaging:

All [Rigid Plastic Packaging Containers \(RPPC\)](#) shall contain at least 25 % post-consumer recycled content.

All other plastic packaging should contain the highest percentage practical of recycled plastic content, aiming for a minimum of 30 % recycled content (pre- and/or post-consumer).

All plastic packaging shall be recyclable.

The use of plastic bags shall be limited to cases where they are essential to maintain the appropriate and necessary level of safety and hygiene for concerned packed products.

### 8.4. Paper Packaging:

Paper-based packaging shall either be supplied by a Forest Stewardship Council (FSC) certified source (or equivalent) or contain a minimum of 10 % recycled content.

Additionally, elemental chlorine shall not be used to bleach virgin or recovered content fibers used in product packaging.

### **8.5. Wood Packaging:**

Solid wood packaging materials that are used in international trade and may serve as a pathway for plant pests shall be treated and marked when exported or imported and be free of bark, according to UN Standard ISPM-15. For further information, refer to [Appendix C](#).

Sawdust, wood wool, shavings and raw wood cut into thin pieces are not suitable pathways for introduction of quarantine pests and are not regulated unless technically justified.

### **8.6. Regional Requirements for Product Packaging:**

Packaging shall comply with various state, country and regional requirements as outlined below. Additional information on these requirements can be obtained from references contained in [Appendix C](#).

**8.6.1. Regional Packaging Reporting:** Suppliers shall provide the weight, volume, material composition, including recycled content expressed in percent (%), of all the components of the packaging supplied to Kodak upon request to facilitate calculation of Regional Packaging reporting obligations.

**8.6.2. Dangerous Goods Packaging:** Packaging used to transport Dangerous Goods shall meet UN standards and suppliers shall provide a Dangerous Goods packaging certificate upon request which declares that the materials have been packed and stowed in compliance with the applicable regulations (IMDG or IATA).

#### **8.6.3. Requirements in the European Union (EU):**

##### **8.6.3.1. European Directive on packaging and packaging waste**

Suppliers shall provide Kodak with a Certificate of Conformity to "essential requirements" fixed by Directive 94/62/EC, when requested.

##### **8.6.3.2. Regulation (EU) 2023/1115 on products associated with deforestation**

Packaging materials made with paper or wood shall be:

- Deforestation-free
- Produced in accordance with the relevant legislation of the country of production.
- Covered by a due diligence statement.

Suppliers shall provide Kodak with the information outlined in Article 9 of EU 2023/1115 upon request to allow the necessary due diligence checks to be carried out.

**8.6.4. Requirements in South Korea:**

**8.6.4.1.** Article 14 of the “Act on the Promotion of Saving and Recycling Resources” requires that all foam packaging components used as cushioning materials for electronic equipment in Korea be marked with a "separate discharge" mark. The mark facilitates the separation of products and packaging for recycling. Exemptions include: packaging and packaging component materials with a surface area of 50 cm<sup>2</sup> or less; containers with components weighing 30 grams or less; and packaging and packaging component materials whose nature and structure impede printing, engraving or labeling on the material.

**8.6.4.2.** Per Ministry of Environment Notice No. 2019-244, the following packaging materials are not allowed:

- Poly Vinyl Chloride (PVC) laminations, shrink wraps and coatings
- Colored Polyethylene Terephthalate (PET) bottles
- PET bottle label adhesive that does not peel off from the bottle according to Annex 1 of Packaging Material Recyclability Rating Evaluation Standard

## 9. Appendices

### Appendix A – Declarable and Restricted Materials

Substance/Substance Group	Qualification/Threshold	Reference	Product Type
Animal and plant derived substances	Declare all substances that are intentionally added or known to be present as an impurity.	<ul style="list-style-type: none"> <li>• Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES I, II, III)</li> <li>• IUCN Red List of Threatened Species</li> <li>• USA: Endangered Species Act (ESA)</li> <li>• Kodak requirement</li> </ul>	Articles Chemicals Packaging Equipment
Biocides / Biostats / Pesticides	Declare all substances that are intentionally added.	<ul style="list-style-type: none"> <li>• USA: Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)</li> <li>• Canada: Pest Control Products Act (S.C. 2002, c. 28)</li> <li>• Biocidal Products Regulation (BPR, Regulation (EU) 528/2012)</li> <li>• South Korea: Consumer Chemical Products and Biocides Safety Act</li> <li>• Blue Angel requirement</li> </ul>	Articles Chemicals Packaging Equipment
Brominated flame retardants	<p>Use of polybrominated biphenyls (PBBs) and polybrominated diphenyl ethers (PBDEs) at concentrations above 0.1% by weight (1000 ppm), as measured at the homogeneous level, is not permitted.</p> <p>Use of brominated flame retardants other than PBBs and PBDEs at concentrations above 0.1% by weight (1000 ppm), as measured at the product level, is not permitted.</p>	<ul style="list-style-type: none"> <li>• Kodak Requirement</li> <li>• RoHS Directive 2011/65/EU and (EU) 2015/863</li> <li>• USA: TSCA Section 6(h)</li> <li>• Canada - CEPA - Prohibition of Certain Toxic Substances</li> </ul>	Articles Chemicals Packaging Equipment

Substance/Substance Group	Qualification/Threshold	Reference	Product Type
Carcinogens, Mutagens, and Reproductive Toxicants (CMR)	Declare all substances that are intentionally added or known to be present as an impurity.	<ul style="list-style-type: none"> <li>• Known human carcinogens:                             <ul style="list-style-type: none"> <li>○ IARC 1;</li> <li>○ ACGIH A1;</li> <li>○ NTP “known to be human carcinogen”</li> </ul> </li> <li>• Suspected to be carcinogens:                             <ul style="list-style-type: none"> <li>○ IARC 2A, IARC 2B;</li> <li>○ ACGIH A2;</li> <li>○ NTP “reasonably anticipated to be a carcinogen”</li> </ul> </li> <li>• 13 OSHA carcinogens</li> <li>• Carcinogen, Mutagen, Reproductive Toxicant (CMR):                             <ul style="list-style-type: none"> <li>○ GHS category 1A, 1B &amp; 2;</li> </ul> </li> <li>• CERHR classification "Serious concern" and "Concern" for adverse reproductive effects</li> <li>• CA Proposition 65 list of reproductive / developmental toxicants and carcinogens</li> <li>• SVHC Candidate List of EU REACH 1907/2006</li> </ul>	Articles Chemicals
Chemicals of concern	Declare all materials that are known to cause irreversible significant adverse effects in humans or are strongly presumed to have the potential to cause such effects by relevant routes of exposure (other than CMRs)	<ul style="list-style-type: none"> <li>• USA: TSCA Section 6 (15 U.S.C. §2605)</li> <li>• GHS criteria: Specific target organ toxicity (STOT) – repeated exposure Category 1 or 2</li> <li>• Blue Angel requirement</li> </ul>	Articles Chemicals

Substance/Substance Group	Qualification/Threshold	Reference	Product Type
Conflict Minerals: Tantalum Tin Tungsten Gold	Declare all substances that are intentionally added or known to be present as an impurity.	<ul style="list-style-type: none"> <li>Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act</li> <li>EU Conflict Minerals Regulation 2017/821</li> </ul>	Articles Equipment
Endocrine Disrupters	Declare all substances that are intentionally added or known to be present as an impurity.	<ul style="list-style-type: none"> <li>SVHC Candidate List of EU REACH 1907/2006</li> <li>Substances classified as Category 1 or Category 2 endocrine disruptors for human health or for the environment under CLP regulation</li> <li>List I and List III of the ED lists developed by the Flemish, Danish, French, Dutch, and Swedish authorities found at <a href="#">The ED Lists   Endocrine Disruptor List</a></li> </ul>	Articles Chemicals
EPA high-priority chemical substances	Declare all substances that are intentionally added or known to be present as an impurity.	<ul style="list-style-type: none"> <li>USA: TSCA Section 6 (15 U.S.C. §2605)</li> </ul>	Articles Chemicals Equipment
Fluorinated Greenhouse Gases (PFC, SF6, HFC)	Shall not be intentionally added or used in manufacturing.  When no alternative exists, only Fluorinated Greenhouse Gases with low Global Warning Potential should be contained in products delivered by suppliers to Kodak. Suppliers are required to provide Kodak with the name of contained Fluorinated Greenhouse Gases, their weights in each concerned product, and their Global Warning Potentials upon request.	<ul style="list-style-type: none"> <li>Kodak Requirement</li> <li>(EU) No 517/2014</li> <li>USA: EPA 40 CFR Part 82 Subpart G</li> <li>WA State Bill 1112, Hydrofluorocarbon Greenhouse Gas Emissions.</li> </ul>	Chemicals Equipment

Substance/Substance Group	Qualification/Threshold	Reference	Product Type
<p>Heavy Metals:</p> <p>Cadmium/cadmium compounds</p> <p>Hexavalent chromium /hexavalent chromium compounds (Cr<sup>+6</sup>)</p> <p>Lead/lead compounds</p> <p>Mercury/mercury compounds</p> <p>Nickel/ nickel compounds</p> <p>Copper/ copper compounds</p>	<p>Declare all substances that are intentionally added or known to be present as an impurity.</p> <p>In packaging: the total concentration of intentionally added cadmium, hexavalent chromium, lead, and mercury cannot exceed 100 ppm. Refer to <a href="#">Appendix D</a> for the test methodology.</p> <p>In batteries: Cadmium/cadmium compounds are banned from use for concentrations ≥0.001 % by weight. Lead/lead compounds require labeling if concentrations ≥0.004 % by weight. Mercury/mercury compounds are banned from use for concentrations ≥0.0005 % by weight.</p>	<ul style="list-style-type: none"> <li>• Annex XVII of EU REACH1907/2006 (18, 23, 27, 47, 63)</li> <li>• China Administrative Measures on Electronic Information Products Pollution Control</li> <li>• EU Battery Directive 2006/66/EC and EU Battery Regulation 2023/1542</li> <li>• EU Packaging &amp; Packaging Waste Directive 94/62/EC Article 11</li> <li>• RoHS Directive 2011/65/EU and (EU) 2015/863</li> <li>• Products Containing Mercury Regulations SOR2014/254</li> <li>• USA California Electronic Waste Recycling Act (California RoHS)</li> <li>• Blue Angel requirement</li> </ul>	<p>Articles</p> <p>Chemicals</p> <p>Equipment</p> <p>Packaging</p>
<p>IEC 62474 Declarable Substances</p>	<p>Declare all declarable groups and substances as identified in IEC 62474, located at <a href="#">IEC 62474</a></p> <p>The Declarable Substance List (DSL) and the Reference Substance List (RSL) can be found along the left-hand side of the IEC 62474 website.</p> <p>The DSL is the list of declarable groups and substances.</p> <p>The RSL provides an indicative list of substances, including CAS numbers, that are included within a substance group.</p>	<ul style="list-style-type: none"> <li>• IEC 62474 - Material Declaration for Products of and for the Electrotechnical Industry</li> </ul>	<p>Articles</p> <p>Equipment</p>

Substance/Substance Group	Qualification/Threshold	Reference	Product Type
Mineral oils - Mineral oil aromatic hydrocarbons (MOAH) and mineral oil saturated hydrocarbons (MOSH)	Shall not be ingredients used in printing inks for packaging nor product documentation.	<ul style="list-style-type: none"> <li>France: Anti-waste and Promotion of Circular Economy, Law 2020-105</li> <li>Blue angel requirement</li> </ul>	Chemicals Packaging
Nanomaterials	Declare particles that are considered <a href="#">nanomaterials</a> as well as provide any available data such as: <ul style="list-style-type: none"> <li>Specific surface area, shape, density</li> <li>Aggregation or agglomeration tendency</li> <li>Surface modification</li> <li>Physical-chemical properties (e.g., octanol-water partition coefficient, solubility, etc.)</li> <li>Toxicity data</li> </ul>	<ul style="list-style-type: none"> <li>USA: TSCA (40 CFR 704)</li> <li>Commission Recommendation of 10 June 2022 on the definition of nanomaterial 2022/C 229/01</li> </ul>	Articles Chemicals
Ozone-Depleting Substances (ODS)	Shall not be intentionally added or used to manufacture products supplied to Kodak.	<ul style="list-style-type: none"> <li>Montreal Protocol</li> <li>List of Class I and Class II ODS can be found here: <a href="#">Ozone-Depleting Substances   US EPA</a></li> </ul>	Articles Chemicals Equipment Packaging
Per- and polyfluoroalkyl substances (PFAS)	The following sub-categories of PFAS shall not be intentionally added or known to be present as an impurity: PFOS and its derivatives PFOA and its derivatives PFHxS and its derivatives PFHxA and its derivatives C9 - C14 PFCA Declare all PFASs (including other subcategories not listed above) that are intentionally added or known to be present as an impurity.	<ul style="list-style-type: none"> <li>Kodak requirement</li> <li>EU Persistent Organic Pollutants (POPs) Regulation EU 2019/1021</li> <li>USA: TSCA Reporting and Recordkeeping Requirements for Perfluoroalkyl and Polyfluoroalkyl (PFAS) Substances</li> <li>Canada - CEPA - Prohibition of Certain Toxic Substances</li> </ul>	Articles Chemicals Equipment Packaging



Substance/Substance Group	Qualification/Threshold	Reference	Product Type
Persistent, Bioaccumulative, and Toxic (PBT), very Persistent and very Bioaccumulative (vPvB), Persistent, Mobile and Toxic (PMT), very Persistent and very Mobile (vPvM), or Persistent Organic Pollutant (POP) substances	Declare all substances that are intentionally added or known to be present as an impurity.	<ul style="list-style-type: none"> <li>• USEPA Sustainable Futures Guidance</li> <li>• USA: TSCA section 6(h)</li> <li>• European Union REACH Directive/CLP regulation</li> <li>• Annex XIII of EU REACH 1907/2006</li> <li>• Annex I of EU POPs 2019/1021</li> <li>• Stockholm Convention on Persistent Organic Pollutants</li> </ul>	Articles Chemicals Equipment Packaging
Phthalates	Declare all substances that are intentionally added or known to be present as an impurity. Shall not be intentionally added in packaging.	<ul style="list-style-type: none"> <li>• Kodak requirement</li> <li>• US Toxics in Packaging Clearinghouse (TPCH)</li> </ul>	Articles Chemicals Equipment Packaging
Phenol, isopropylated phosphate (3:1) (PIP (3:1))	Shall not be intentionally added.	<ul style="list-style-type: none"> <li>• USA: TSCA section 6(h)</li> <li>• Kodak Requirement</li> </ul>	Articles Equipment
Polyvinyl chloride (PVC) and polyvinylidene dichloride (PVDC)	<p>PVC shall not be used for plastic packaging.</p> <p>PVC and PVDC shall not be used at concentrations &gt;0.1 % by weight (1000 ppm) in articles.</p> <p>Declare all PVC and PVDC that are intentionally added to equipment.</p>	<ul style="list-style-type: none"> <li>• Blue Angel requirement</li> <li>• South Korea Ministry of Environment Notice No. 2019-244</li> <li>• Kodak requirement</li> </ul>	Articles Equipment Packaging
REACH restricted substances	Declare all substances intentionally added or known to be present as an impurity. Substances that fall under Restriction 75 due to their classification as skin corrosive category 1, 1A, 1B or 1C, skin irritant category 2, serious eye damage category 1 or eye irritant category 2 can be considered exempt from this requirement.	<ul style="list-style-type: none"> <li>• Annex XVII of EU REACH 1907/2006</li> <li>• Kodak requirement</li> </ul>	Articles Chemicals Equipment Packaging

Substance/Substance Group	Qualification/Threshold	Reference	Product Type
Restriction of Hazardous Substances (RoHS)	Equipment in scope of the RoHS Directive shall declare compliance on their EU DoC.	<ul style="list-style-type: none"> <li>• RoHS Directive 2011/65/EU and (EU) 2015/863</li> <li>• Kodak requirement</li> </ul>	Equipment
Sensitizers	Declare all known respiratory or skin sensitizer substances that are intentionally added or known to be present as an impurity.	<ul style="list-style-type: none"> <li>• Kodak requirement</li> <li>• Blue Angel requirement</li> </ul>	Articles Chemicals
Substances of Very High Concern (SVHCs)	Declare all SVHCs present at greater than 0.1 % by weight	<ul style="list-style-type: none"> <li>• SVHC Candidate List in Annex XIV of EU REACH 1907/2006</li> </ul>	Articles Chemicals Equipment Packaging
Synthetic polymer microparticles	Declare all synthetic polymer microparticles as defined by Annex XVII of EU REACH 1907/2006	<ul style="list-style-type: none"> <li>• Annex XVII of EU REACH 1907/2006 (78)</li> </ul>	Articles Chemicals
Toxicity characteristic substances	<p>For articles and packaging: Declare all components listed in 40 CFR 261.24, Table 1. Provide TCLP (Toxicity Characteristic Leaching Procedure) test data for any articles which contain a component from 40 CFR 261.24, Table 1</p> <p>For chemicals: Declare all components listed in 40 CFR 261.33 and provide the weight %.</p>	<ul style="list-style-type: none"> <li>• USA: 40 CFR 261.24, Table 1</li> <li>• USA: 40 CFR 261.33</li> </ul>	Articles Chemicals Packaging
Volatile Organic Compounds (VOC)	Declare all substances that are intentionally added or known to be present as an impurity.	<ul style="list-style-type: none"> <li>• Kodak requirement</li> <li>• USA: EPA 40 CFR 59</li> </ul>	Articles Chemicals Equipment Packaging
Waste Electrical and Electronic Equipment (WEEE)	Equipment in scope of the WEEE Directive shall be marked with the WEEE symbol.	<ul style="list-style-type: none"> <li>• EU Directive 2012/19/EU</li> </ul>	Equipment

**Appendix B – Traceability Requirements for Difficult-to-Identify Components**

Description	Plastic & Foam	Wire Harness	Circuit Boards	Safety Label
Requirements	Materials shall be identifiable to safety agency inspectors.	Shall be identifiable as having been produced under the UL Recognized Wire Harness Manufacturer's Program and CSA Certified Wire Harness Program.	Shall be identifiable as having been produced under the UL Recognized Component Printed Wiring Program.	Shall be identifiable as having been produced under the UL and/or CSA Marking and Labeling System approval programs.
Required Information from supplier with each shipment	<ul style="list-style-type: none"> <li>• Molder name</li> <li>• Kodak part number</li> <li>• Raw material manufacturer name</li> <li>• Plastic manufacturer type designation (e.g., "Cycloy C6200")</li> <li>• Month and year molded</li> <li>• UL Recognized Molder program number, if applicable</li> </ul> <p>In addition, for parts with metallic (EMI) coating, identify the applicator, the process used, and the metallic (EMI) coating material used.</p>	Wire Harness label on the shipping container or on each harness.	Mark parts according to UL Printed Wiring Program (e.g. Manufacturer's name or trademark and board type).	Manufacturer's identity (e.g., name or trademark) and manufacturer's label type (e.g. Type 123).
Acceptable methods to provide traceability to Kodak	<ul style="list-style-type: none"> <li>• Molded on each part or</li> <li>• "Stuffer sheet" containing the 6 items above in the smallest shipping container or</li> <li>• Label on every shipping container stating the 6 items above.</li> </ul>	<ul style="list-style-type: none"> <li>• Label on each harness</li> <li>• Label the smallest deliverable package</li> <li>• Label the shipping box for the harnesses contained in the box</li> </ul>	Mark parts according to UL Printed Wiring Program requirements.	<ul style="list-style-type: none"> <li>• For CSA approved labels, place an identifier on each label.</li> <li>• For UL approved labels, place the identifier on each label or smallest delivered package.</li> </ul>
Related supplier safety expectations	Parts will be produced under the UL Recognized Fabricated Parts Program.	Harnesses will be produced under the UL Recognized Wiring Harness Manufacturer program and be CSA Certified.	Parts will be produced under the UL Recognized Printed Wiring Board program.	Safety labels will be approved to UL and/or CSA "Marking and Labeling System" requirements.

## **Appendix C – Packaging References**

### **European Parliament and Council Directive 94/62/EC on Packaging and Packaging Waste (Amended by Directive (EU) 2018/852)**

Further information can be obtained at: [Summaries of EU legislation - EUR-Lex \(europa.eu\)](#)

### **97/129/EC: Commission Decision of 28 January 1997 establishing the identification system for packaging materials**

Further information can be obtained at: [Decision - 97/129 - EN - EUR-Lex \(europa.eu\)](#)

### **Wood Packaging Materials**

Approved treatment includes fumigation with methyl bromide or heat treatment (HT)—heated to a core temperature of 56 deg C (133 deg F) for 30 min. Kiln drying (KD) or chemical pressure impregnation (CPI) may be considered heat treatment to the extent that these meet the heat treatment specifications mentioned.

Treated solid wood packaging materials shall be marked with the International Plant Protection Convention (IPPC) logo, the ISO two-letter country code followed by a unique number assigned by the National Plant Protection Organization (NPPO) to the producer, and the IPPC approved abbreviation for the phytosanitary treatment measure used (e.g., HT and MB).

Recycled, remanufactured or repaired wood packaging material should be re-certified and re-marked. All components of such material should have been treated.

Further information may be obtained at: [IPPC - International Plant Protection Convention](#)

### **Korean Separate Discharge Mark**

Further information can be found at: [Korean Separate Discharge System](#)

**Appendix D – Instructions for Testing and Sampling Heavy Metals in Packaging**

<b>Chemical</b>	<b>Technique</b>	<b>Specification</b>	<b>Test Method*</b>
Cadmium	Inductively coupled plasma	Less than 100 ppm total with Pb, Hg, and Cr (VI)	6010
Lead	Inductively coupled plasma	Less than 100 ppm total with Cd, Hg, and Cr (VI)	6010
Mercury	Cold Vapor Atomic Absorption Spectroscopy	Less than 100 ppm total with Cd, Pb, and Cr (VI)	7470, 7471
Chromium VI	Atomic Absorption Spectroscopy	Less than 100 ppm total with Cd, Pb, and Hg	7190, 7195, 7196, 7197

**\* Test Method - The US EPA's SW 846 set of analytical methods for the determination of chemical concentrations in wastes and other materials.**

## Appendix E – Definitions

**Articles** – Item/object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition and which have an end-use function in whole or in part dependent on their shape or design but does not require alternating or direct electric current to operate. Examples of articles include paper, bolts, cables, tape. *Note: Batteries and components used to manufacture EEE shall be assessed and declared per the requirements for EEE specified in this document (see definition).*

**Chemicals** – Products or raw materials made of organic or inorganic substances with a distinct molecular composition, which can be a solid, liquid, or gas. Chemicals may be individual substances or mixtures. Examples of chemical products include surfactants, pigments, solvents, polymers, etc. Chemicals can also include articles that act as containers or carriers for chemicals such as alcohol cleaning wipes.

**Conflict-affected and high-risk areas** – Conflict-affected and high-risk areas are identified by the presence of armed conflict, widespread violence, or other risks of harm to people. Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterized by widespread human rights abuses and violations of national or international law.

**Conflict Minerals** – Conflict minerals (currently 3TG, also known as tantalum, tin, tungsten, gold, and their derivatives) as defined by US Securities and Exchange Commission Form SD and Regulation (EU) 2017/821.

**Due Diligence management system** – Implementation of the five-step framework defined by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ([“OECD Guidance”](#)) This includes establishing and maintaining strong company management systems, establishing and maintaining a process to identify and assess risks in Kodak’s supply chain, responding to identified risks, audit smelters/refiners sourcing activities, and publicly reporting on supply chain due diligence.

**Electrical and Electronic Equipment (EEE)** – All equipment that has at least one intended function which is dependent on electric current or electromagnetic fields, or that generates or transfers or measures such currents and fields. Finished EEE include standalone printers, presses, plate setters, plate processors, scanners, work stations, and external power supplies. EEE also applies to components and parts that are formed to a specific shape or design which are intended to be incorporated into an EEE and may or may not have a power source. This includes, but is not limited to: sensors, hardware components, printed circuit boards, batteries, cables, cords, mechanical and electromechanical sub-assemblies and sub-components used to assemble equipment products and/or systems.

**Intentionally added** – Deliberate use in the formulation of a product where its continued presence is desired to provide a specific characteristic, appearance, or quality.

**Known to be present** – Supplier has knowledge that the material is present through existing analytical information, second tier supplier declarations, or other methods.

**Nanomaterials** - Particles which are considered to be nanomaterials as described by U.S. EPA TSCA (40 CFR 704) and/or meet the definition of nanomaterials according to the EU *Commission Recommendation on the definition of a nanomaterial (2022/C 229/01)*

Recommendation on the definition of a nanomaterial ([2022/C 229/01](#))

'Nanomaterial' means a natural, incidental or manufactured material consisting of solid particles that are present, either on their own or as identifiable constituent particles in aggregates or agglomerates, and where 50 % or more of these particles in the number-based size distribution fulfil at least one of the following conditions:

- (a), one or more external dimensions of the particle are in the size range 1 nm to 100 nm;
- (b), the particle has an elongated shape, such as a rod, fibre or tube, where two external dimensions are smaller than 100 nm and the other dimension is larger than 100 nm;
- (c), the particle has a plate-like shape, where one external dimension is smaller than 100 nm and the other dimensions are larger than 100 nm.

In the determination of the particle number-based size distribution, particles with at least two orthogonal external dimensions larger than 100 nm need not be considered. However, a material with a specific surface area by volume of  $< 6 \text{ m}^2/\text{cm}^3$  shall not be considered a nanomaterial.

US EPA Guidance on Nanomaterial Definition ([40 CFR Part 704](#))

[Nanomaterials]... *are solids at 25 °C and standard atmospheric pressure; that are manufactured or processed in a form where any particles, including aggregates and agglomerates, are in the size range of 1-100 nanometers (nm) in at least one dimension; and that are manufactured or processed to exhibit one or more unique and novel properties. This rule does not apply to chemical substances manufactured or processed in forms that contain less than 1% by weight of any particles, including aggregates and agglomerates, in the size range of 1-100 nm. These parameters are for purposes of identifying chemical substances that are subject to the rule and do not establish a definition of nanoscale material.*

**Packaging** – Any material intended to be used for the containment, protection, handling, delivery and presentation of goods from raw materials to processed goods from the producer to the user or consumer. Packaging may be classified as primary packaging, grouped or secondary packaging, and transport or tertiary packaging. Examples of packaging include: cartons, crates, pails, trays, bags, pallets, pallet collars, drums, load boards, skids, dunnage, interior or exterior blocking, bracing, cushioning, weatherproofing, exterior strapping, stretch wrapping, coatings, closures, inks, adhesives, interleaving paper and labels.

**Recycled Content** – The concentration of materials that have been recovered or otherwise diverted from the solid waste stream, either during the manufacturing process (pre-consumer) or after the consumer use (post-consumer) and have been reused in the production of another product.

**Reportable Application** – Specific purpose of use that triggers the reporting requirement. Note: This use is defined in the scope of the underlying law or industry standard. Examples include batteries, textiles, wood, etc.

**Rigid Plastic Packaging Container (RPPC)** – Any plastic package having a relatively inflexible finite shape or form that has a minimum capacity of eight fluid ounces (236.6 milliliters), or the equivalent volume, and a maximum capacity of five fluid gallons (18.9 liters), or the equivalent volume, and is capable of maintaining its shape while holding other products. RPPCs include, but are not limited to: bottles, cartons, pails, clamshells and other receptacles.

**Threshold Level** – Concentration level which defines the limit above which the presence of a substance in a product shall be declared.



**Appendix F – Revision History**

Revision	Section	Change	Date
8.0	All	Major restructuring, formatting, and requirements update.	08/29/2024