

Version	Date	Writer	Modification - Remarks
01	10/04/2020	Zhou Wen & Sophie Ducrocq	Creation
02	18/02/2022	Sophie Souillard	Update following the migration in MAPEDIA
03	06/06/2022	Sophie Souillard	Update by adding the APPENDIX 2 "Maped Regulatory Perimeters"

1. <u>CONTRACT PARTIES</u>

This agreement is made between: MAPED Route de Pringy, BP14, 74371 PRINGY CEDEX, FRANCE and hereinafter referred to as "MAPED". represented by "MAPED representing name", it's "MAPED representing title",

And "SUPPLIER NAME", "Supplier address", represented by "Supplier representing name", it's "Supplier representing title", and hereinafter referred to as the "SUPPLIER",

2. <u>DEFINITIONS</u>

Minor defect: Defect that does not significantly impair the quality appearance of the product and does not significantly affect service to customer. These defects are not traffic affecting.

Major defect: Defect that seriously affects product quality appearance and will cause customer complaint or reject of our product, and require immediate attention by supplier.

Critical defect: A defect which cause no safety issue, but partial product functionality lost **Super critical defect:** A defect severely affecting public safety or incapable product function. **Line Rejects:** Defective Products are found and identified in Maped's production lines.

3. <u>GENERAL – ZERO DEFECTS</u>

Supplier and Maped both agree that any delivery of a Product or Spare Part not in accordance with specification of products or agreement agreed by both Maped and supplier is unacceptable. Therefore, both parties will strive towards continuous quality excellence by (i) actively cooperating and improving conformity and reliability performances and (ii) implementing the necessary preventive and corrective actions, all in accordance with this Quality Agreement.

4. **PRODUCT QUALIFICATION**



All Products or Spare Parts to be supplied by Supplier to Maped according to this Agreement shall be checked and/or tested by Supplier. Maped may have its representatives participate or be present at such quality controls, as it deems necessary. In addition, Supplier shall timely provide evidence to Maped of its capability to manufacture (mass production) and deliver the Products in accordance with (i) the agreed Product Specifications and (ii) Maped's applicable deliverables and time schedule. In addition, Supplier will ensure its internal qualification process is able to fulfill the requirements specified in this Quality Agreement.



5. <u>TESTS AND INSPECTIONS REQUESTED</u>

At Maped's request, Supplier shall perform, at its own costs and expenses the following tests and inspections: (i) qualification tests including both product functionality and safety & non-toxic; (ii) monitoring tests; and (iii) specific inspections. All relevant test requirements and related documents shall be able to supply & review by Maped. It's mandatory requested to provide Maped finished product inspection report and necessary certificates before delivery to confirm quality & compliance of product meets Maped specifications requested.

6. <u>CHANGE REQUESTS</u>

At least the following changes shall be subject to Maped's prior written consent, which shall be requested by Supplier by using the Change Control Procedure, as set forth below: (i) changes to the formula, fit, form and function of the Product; (ii) significant changes to the manufacturing technology such as, but not limited to tooling, processes, methods and materials; (iii) changes to the packing and the logistics of the Products; (iv) move of the production to a not yet qualified manufacturing site; (v) introduction of new technologies; (vi) changes in materials or components specified by Maped and (vii) change in Supplier's materials resources and significant supply chain management.

6.1 CHANGE REQUEST PROCEDURE FOR SUPPLIER

Supplier must notify Maped by using Appendix #1: <Supplier Change Request Form> for any proposed changes at least thirty (30) calendar days before such intended change except for toys & food contact products which request at least ninety (90) calendar days.

This notification should also include the appropriate documentation to support Maped's evaluation of the impact and justification of the proposed change, along with any modified specifications, costs associated with such proposed change (including impact on the price of the product), impact on the lead-time of the product and desired completion date(s), cost of product safety and non-toxic compliance analysis in 3rd party laboratory. The above mentioned notification will be accompanied by information from the Supplier which proves that the product still meets the agreed upon product specifications and the related quality aspects of that product.

Maped will advise Supplier as soon as practicable of its decision with respect to the proposed change. Maped reserves the right to accept or reject all such proposed changes.

6.2 CHANGE REQUEST PROCEDURE FOR BUYER

Maped shall notify Supplier in writing of any proposed change. Supplier shall respond in writing within ten (10) calendar days of such notification. Supplier's response shall include appropriate documentation to support Buyer's evaluation of the impact and justification of the proposed change, along with any modified specifications, costs associated with such proposed change (including impact on the price of the Product), impact on lead-time of the Product and achievable completion date(s).

Maped will advise Supplier as soon as practicable upon receipt of such response to its decision with respect to the proposed change. Maped reserves the right to accept or reject all such responses.

Upon the approval of Maped for the intended changes, supplier needs to send the samples of proposed changes to Maped together with supplier qualification document for validation before mass production and delivery.



7. <u>INSPECTIONS BY SUPPLIER</u>

Supplier shall perform internal quality inspection on raw material, components, semi-finished product and finished product to be sure product produced and delivered to Maped meet all specifications defined, these inspections include but not limit on First Article Inspection, workers self-inspection, cross process checking and dedicated checking made by quality inspector. It's mandatory for supplier to carry out inspection on finished products and send their internal inspection report to Maped contact window prior to delivery. Supplier shall monitor process capability & stability and maintain good quality assurance level; In additional, Supplier shall be able to provide all necessary quality inspection report to Maped upon request.

For nonconformity batch reported after Maped incoming inspection, it's under supplier responsibility to take back rejects within time frame defined as following table, if supplier did not take back the goods within requested time, Maped will NOT take responsibility in case of goods damage and lost. Maped keep right to assign a logistic company to return nonconformity goods to supplier and all handing costs of this return shall be invoiced to supplier; Maped keep rights to take other actions to settle these rejects until scrap them in case goods not treated at requested time frame.

Distance between supplier and Maped	Rejects handle date allowed
Supplier located at Suzhou or Shanghai (physical distance ≤ 100km)	≤ 2 working days
Supplier located at Jiangsu & Anhui province (physical distance between 100km to 500km)	\leq 3 working days
Supplier located far to Maped (physical distance ≥500km)	\leq 5 working days

8. <u>MAPED PRE SHIPMENT POLICY (PSI)</u>

MAPED Group defines hereunder the policy for Pre Shipment Inspection (PSI).

Suppliers and Partners (name Seller hereunder) are classified in 3 groups according to quality performance and historical delivery data:

Class C: New Seller and Seller not working in insurance quality. Pre-shipment inspection is mandatory Class B: Seller working in insurance quality. Pre-shipment inspection is regularly according to Maped Quality

department decision.

Class A: Seller working in full Insurance Quality. Pre-shipment inspection is managed by the Seller quality team except first mass production shipment. The PSI report done by the seller must be sent to Maped Quality team.



How to classify ABC suppliers:

Class	ISO0001 partificate	Same las validation	Maped Pre-Assessment or assessment		
Class	ISO9001 certificate	Samples validation	Quality	Regulation	
А	YES	PASS in one time	A,B	A,B	
В	YES or NO	PASS within two times	B,C	B,C	
С	NO	PASS more than two times	C,D	C,D	

Maped Pre-shipment inspection management:

Class	1st shipment	2nd shipment	3rd hipment	4th shipment
A	YES	NO if first inspection PASS; it's fully under responsibility of seller quality team		
В	YES	YES	NO if first two inspections PASS; Maped make ramdomly pre-shipment inspections	
с	YES	YES	YES	NO if first three inspections PASS; Maped make ramdomly pre-shipment inspections

Randomly = PSI decision will be reviewed in quality weekly meeting according to last Quality data and PSI will occur at minimum 1 time per year.

Rules for PSI:

- The Seller shall send Maped buyer and Maped Quality Department a notice for goods availability for inspection. The Seller shall give between 7 to 10 days' notice to the inspection agent prior to the proposed date of the pre-shipment inspection
- To carry out the inspection, the seller shall provide the inspection agent with purchase order, shipment quantities, internal inspection reports, and other relevant documents. The seller shall provide all necessary facilities to the inspecting agent to enable it to carry out a quality & quantity inspections and to conduct tests, analysis and other processes as may require in the circumstances.
- To carry out the inspection, the Seller shall make sure at least 80% of order quantities (finished goods) are completed prior to inspection date and the rest has to be in packing process at least. If it is not the case, the seller will bear the cost of 2nd inspection.
- The seller shall make all necessary arrangement for the handling presentation (including unpacking and re-packing).
- In case of PSI failed for critical or supercritical issues a 2nd PSI must be organized at suppliers' charge.



- In case of PSI failed for major or minor issues the supplier must provide :
 - 1) Rework video
 - 2) Quality assurance guarantee letter

3) Internal report in Maped requested form with statement of rework process and rework results (defective pieces rejected per defect).

• Only Maped Quality Manager (MOS or Maped France) must give the final decision (Green Light to release shipment) in case of failed PSI.

Maped incoming inspection management:

Class	Complexity of product				
01833	Light	Medium	High		
А	Quality Assuarance	Quality Assuarance	Ramdomlyinspection		
В	Quality Assuarance	Ramdomlyinspection	Each Batch		
С	Ramdomlyinspection	Each Batch	Each Batch		

Randomly = PSI decision will be reviewed in quality weekly meeting according to last Quality data and PSI will occur at minimum 1 time per year.



9. QUALITY SUPPORT FROM SUPPORT

9.1 <u>COMPLAINT MANAGEMENT – RESPONSE TIMES</u>

In case of any nonconformity on product or services occurred, Maped will inform Supplier by using a formal complaint document, subsequently; Supplier shall agree to comply with the following requirements:

Nonconformity	Complaint confirm	Short term action plan	Official Corrective Action Plan	On-Site Support
Critical defects	24 hours	24 hours	5 working days	Upon Request
Line stop, customer complaint	24 hours	24 hours	5 working days	Upon Request
Lot reject	24 hours	48 hours	10 working days	Upon Request

If no response received from supplier after Maped formal complaint notification, Maped will consider supplier understand and accept Maped requests, Maped formal complaint notifications include but not limited on witting document, email, phone call, fax...etc.

9.2 URGENT SUPPORT

In case of any Critical Defects or Line Stop Failures, Supplier shall provide their emergency supports to Maped in order to resume production and shipment as earlier as possible. This support includes on-site technical assistance, labor and economic support such as sorting defective products, rework defective batches and direct expense may occurred.

9.3 SUPPORTS FOR CONTINUOUS IMPROVEMENT

Supplier will, at Maped's request, provide on-site support and adequate expertise in order to comply with the agreed upon quality requirements set forth in this Quality Agreement. In such case, Maped will make the Defective Products available for analysis by Supplier. The analysis results of Supplier will be used by Supplier to provide appropriate improvement action plans. Supplier is willing to use Maped's reporting requirements and system, if available.

9.4 ACTION PLAN REPORTING

All action plans, such as, but not limited to containment action plans and improvement action plans will be reported in accordance with the Maped CAR form which is described in 8D format.

9.5 <u>RE-QUALIFICATION</u>

If Supplier is listed in worst performance suppliers continuously for 2 years, Maped will restart the supplier qualification and product validation procedure.



10 STOCK ROTATION

Both Supplier and Maped will apply the principle of First In, First Out (FIFO) to stock rotation. Maped wishes to receive "fresh" Products and Spare Parts. In case the Products or Spare Parts are older, Maped reserves the right to return the Products or Spare Parts for replacement by "fresh" Products or Spare Parts at Supplier's costs. Other options may be agreed upon in writing between Supplier and Maped.

11. COSTS AND EXPENSES

Costs and expenses for which Supplier shall be responsible as (i) costs to do 100% inspection on rejected lots of batches/sorting costs; (ii) costs to scrap the defective products; (iii) additional costs of repair in the production line; (iv) additional costs of repair of the Products returned from customer; (v) travel costs; (vi) production delay costs and (vii) labor costs.

Classification of non-quality cost	Standard price
Management fee	500 RMB per complaint
Labor cost: implementation of prevent action, rework & scrap cost.	50 RMB per hour (Year 2018)
Cost generated at downstream process or requested by the 3 rd party	Take the actual cost
Raw material, semi-product products & finished product lost fee	Take the actual cost
Accessory changed fee	Take the actual cost
Machine stop fee	Standard price in SAP
Line stop fee	Based on direct and in-direct labor cost
Transportation fee	Based on actual fee $+$ 10% commission charge
Repacking and its labor cost	Maped internal handling : 50 RMB per hour Outside Maped handling: take the actual cost
Traveling fee	Based on actual fee + 10% commission charge
Customer compensation cost	Based on actual fee + 10% commission charge
Expert support cost and 3 rd party lab test fee	Based on actual fee + 10% commission charge

Non-quality cost standard:

12. PRODUCT TRACEABILITY

Maped ask 3 levels traceability on all sensitive products such as toys, food contract products, single substance and preparations (a mixture in powder or liquid).

Level 1 Traceability on each individual product: Engrave date clock with Year and Month on plastic part or identify in permanent way MYZ on product external face.

M: The capital letter for Month: A=Jan, B=Feb, C=Mar, etc.

Y: The number for Year: 8=2018, 9=2019, 0=2020, etc.

Z: First capital letter of supplier (production sites : see file Supplier letter code)



Level 2 Traceability on packaging of finished product: last 5 numbers of PO/SO/WO + 1st capital letter of supplier (production sites)

Level 3 Traceability on inner & master cartons: full PO/SO/WO numbers + production date

Supplier shall implement this 3 level product traceability for concerned products as per request of Maped.

13. <u>SUPPLIER DELIVERY PERFORMANCE EVALUATION</u>

Maped check supplier quality performance through IQC incoming inspection results, a non-quality claim may raise depends on supplier quality delivery performance versus target agreed, the purpose of this quality non-quality cost is to push supplier for continues quality improvements.

Maped shall issue invoice to the supplier for this non-quality cost or deduct the amount from delivery payment upon agreement on both parties.

Supplier classification	Supplier classification is defined by Maped Supplier Chain dept in Logistic Agreement according to annual business turnovers between Maped and the supplier, the base of non-quality cost for each classification as following: Class $A = 4000$ RMB; Class $B = 3000$ RMB; Class $C = 2000$ RMB;
Evaluation frequency	Class A = Quarterly; Class B = Semester; Class C = Yearly;
Non-quality cost	= Reject rate * 100 * Supplier classification Reject rate = Reject batches / Total delivery batches Non quality cost shall be limited and not exceed <u>6%</u> of total purchase turnovers

14. QUALITY STANDARD

14.1 PRODUCT QUALITY MUST MEET APPLICABLE CHINESE NATIONAL STNADARDS.

14.1.1 Both Maped and Suppliers agree to follow sampling plan GB/T2828.1 and ISO2859-1 to carry out incoming inspection, please refer to hereunder defect gravity classification chart and its corresponding sampling plan chart.

Defect Gravity	Inspection level	Acceptable quality level (AQL)
Z	II	0.04
A	II	0.4
В	II	1.0
С	II	4.0



N	Sampling size	Accept limit			
Ν		AQL=0.04	AQL=0.4	AQL=1.5	AQL=4.0
2 ~ 8	2	0	0	0	0
9 \sim 15	3	0	0	0	0
16~~25	5	0	0	0	0
$26 \ ^{\sim} 50$	8	0	0	0	1
$51 \ ^{\sim} 90$	13	0	0	0	1
$91 \ ^{\sim} 150$	20	0	0	1	2
151 ~ 280	32	0	0	1	3
$281 \ \ 500$	50	0	0	2	5
501 $^{\sim}$ 1200	80	0	1	3	7
1201 ~ 3200	125	0	1	5	10
3201 ~ 10000	200	0	2	7	14
10001 ~ 35000	315	0	3	10	21
$35001 \ ^{\sim} 150000$	500	0	5	14	21
150001 ~ 500000	800	1	7	21	21
500001 及以上	1250	1	10	21	21

14.1.2 Quality checking instruction.

Please insert here Maped Quality Checking Instructions.

14.2 SAFETY & NON-TOXIC REQUESTS

Please refer to APPENDIX 2 "Maped Regulatory Perimeters" (safety & non-toxic requests)

14.2.1 It is under supplier's responsibility to guarantee above non-toxic compliances, we request supplier to supply us certificate to confirm above compliances, If products detected by customer or any party that does not meet part or all these requests, the supplier will take in charge all consequences including compensation generated.

15. CONTACT PERSONS

Supplier: TBC Buyer (MAPED): TBC

16. <u>SIGNING PARTIES</u> MAPED

SUPPLIER

Supplier Senior Manager

Maped Quality QRSD leader

(Signature)

(Signature)



Appendix #1: Supplier Change Request Form

Maped	供应商变更申请表 2 Supplier Change Request Form 2			Rev A 2018-11-05	
供应商名称 Name of supplier		申请人 Applicant		申请日期 Apply Date	
变更内容 Change content	 (2)制造工艺的重大变更, limited to tooling, processo (3)变更产品包装和包装 (4)生产场地变更到一个; (5)新技术介绍 introducti (6)按照马培德要求所做 	例如但不限于如模具, cs, methods and materials; (方式 changes to the packing 未经确认的场所 move of th on of new technologies; (的材料或部件变更 changes change in Supplier's supply	and the packing methods of the P ne production to a not yet qualified) in materials or components speci	cant changes to the manufacturin products; () d manufacturing site; ()	ng technology such as, but not
	变更前 Before change	变更后 After change		材料 Materials	
			费用分析	模具工装 Tooling & fixture	
			Cost impact analysis	产品测试 Product qualification	
变更原因 Explanation of change				库存处理 Obsolete stocks	
			供应商建议及出货影响评估 Proposal & delivery impact		
	变更涉及产品 Product concerned		变更完成日期 Change completion date		
马培德评估 Maped Evaluation			1		
1. 采购部评估 Comments from Purchase	department				
2. 技术部&市场部评估				评估人 Commented by:	日期 Date:
Comments from Technica	a Marketing department			评估人 Commented by:	日期 Date
3. 质量部评估 Comments from Quality d	epartment			· · · · · · · · · · · · · · · · · · ·	
马培德评估意见:				评估人 Commented by:	日期 Date
Maped Conclusions:					
供应商变更执行跟踪 Supplier change follow up		马培德变更验收 Maped approval		马培德 DCC 文件存档 Maped DCC archive	
档 Change schedule: Request		ality agreement => Maped E	培德评估意见 => 供应商变更封 Evalution => Feedback to supplier		



Appendix #2: Maped Regulatory Perimeters

This appendix is divided in 5 parts according to Maped Product Categories

- **# 2-1:** Colouring products
- **# 2-2:** Creative product
- **# 2-3:** Stationery product
- **# 2-4:** Writing product
- **# 2-5:** Food Contact Product

As mentioned in the Contract: Item 10-6 <u>Regulations</u>

MAPED undertakes to provide regulations perimeter for concerned Products.

SUPPLIER undertakes to make the Product compliance with applicable standards and regulations or MAPED's specific requests.

If applicable, SUPPLIER must send the material safety data sheet or declaration of compliance.

Product compliance regulation is always changing and supplier need to be aware of new regulations, as well as updates to existing regulation, in order to ensure they are prepared to comply in the respect of deadlines requested by Government Authorities. This point is the essence of the contract as Compliance is mandatory.



REGULATORY REQUIREMENT – SPECIFICATIONS

Exigences Spécifications Règlementaires

COLOURING PRODUCT CATEGORY

Colour pencils, Felt pens, Painting...

(Applicable for products which are classified as toys)

Revision	Date	Modification
01	2022-01-03	Creation - PG

GENERAL SPECIFICATIONS - LEGAL REQUIREMENTS

-	REACH regulation N°1907/2006 (EC) R egistration, E valuation, A uthorisation and Restriction of Ch emicals Regulation of the European Union, adopted to improve the protection of human health and the environment from the risks that can be posed by chemicals. REACH Registration of substances in Import Business: The supplier of substances and substances in mixtures in bulk has to prove that all substances are already registered at the ECHA (European Chemical Agency). Substances and mixtures are allowed to be imported only if the substances are verifiable registered by supplier/manufacturer.
	It is not permitted to import substances into the EC without ECHA registration.
-	CLP regulation N°1272/2008 (EC) Regulation on classification, labelling and packaging of substances and mixtures.
_	For substance/mixture, raw materials, MSDS (M aterial S afety D ata S heet) <3 years old, must be in compliance with Regulation REACH N°1907/2006 (EC) and CLP N°1272/2008 (EC) Regulation on classification, labelling and packaging of substances and mixtures REACH Guidance for MSDS: <u>https://echa.europa.eu/-/guidance-on-the-compilation-of-safety-data-sheets</u> Guide on the compilation of safety data sheets: <u>Clic here</u>
-	Substances subjected to authorisation (REACH – Annex 14) are forbidden. List on this web link <u>https://echa.europa.eu/authorisation-list</u>
-	Directive on the safety of toys 2009/48/EC Toy definition art.2.1: products designed or intended, whether or not exclusively, for use in play by children under 14 years of age.
-	General product safety directive 2001/95/EC
-	Directive on packaging and packaging waste 94/62/EC
-	Biocide Regulation (EU) No 528/2012 concerning the making available on the market and use of biocidal products
-	Articles delivered to MAPED must not contain substances TiO2 (CAS 13463-67-7) in powder form containing 1% or more of particles with a diameter \leq 10 µm and classified as Carcinogenic 2 in concentration upper 1%.
_	The use of dimethylfumarate (DMF) & Silica Gel is forbidden.



SPECIFIC REQUIREMENTS

- Chemical test must be realised with finished produced articles or components; not with raw materials.
- Testing laboratories must be an accredited laboratory according to ISO 17025 for the scope of their performed tests.
- Supplier has to make sure to have an appropriate traceability according to Maped Quality specification
- Products must have an neutral odour. The goods with a strange smell or a smell that indicates an improper production, storage will not be accepted
- Technical documentation required like MSDS, Toxical Risk Assessment, self-declaration... must be available in English language and has to be clearly refer to the goods.
- Toys products must be tested according to EN 71 standards under their last harmonized version including EN 71 parts 9 when requested.
- For Germany, ink require = Classification of substances hazardous to waters (Self assessment) Classification is carried out on the basis of the Ordinance on facilities for handling substances that are hazardous to water (Verordnung über Anlagen zum Umgang mit wassergefährdenden Stoffen (AwSV)) of 18 April 2017 (BGBI 2017, Teil I, Nr. 22, Seite 905). This classification index must be noticed on the ink MSDS

CHEMICAL REQUIREMENTS – ANNEX II – III OF THE TOYS DIRECTIVE 2009/48/EC

CMR SUBSTANCES

CMRs are prohibited according to the new Toy Safety Directive but may, however, be used if they are inaccessible to children in any form, including by inhalation, or if they are present in concentrations equal to or smaller than the relevant concentrations for classification of mixtures containing the substances, in accordance with Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP).

It is therefore necessary as part of a chemical safety assessment, to determine whether or not a substance of interest has the formal classification of CMR. This is carried out in the characterization stage of the chemical safety assessment.

The number of substances classified as CMRs is very high and it is therefore not feasible to test for the presence of all these. Instead, the safety assessment is used.

REACH – Annex XVII – Entry 28 to 30 CMR

- o Entry28: https://echa.europa.eu/documents/10162/eb55fb62-09dc-2b02-06e0-3de43590cb97
- Entry29: https://echa.europa.eu/documents/10162/fd311fbb-0127-7043-0db5-04d31dece50a
- o Entry30: https://echa.europa.eu/documents/10162/8700b18c-42ff-51ef-2160-72e14ac7268d

FRAGRANCES REQUIREMENTS

The Toy Safety Directive lists a number of allergenic fragrances, defined by CAS numbers, that are prohibited for use in toys and also a number of fragrances that when used require special labelling of the toy. The safety assessment should check that the toy complies with these requirements.

Traces of a fragrance are allowed provided that their presence is technically unavoidable in good manufacturing practise (GMP) and does not exceed 100 mg/kg. The 100 mg/kg limit is per fragrance substance. The manufacturer should not intentionally use these prohibited fragrances. The limit of 100 mg/kg has been set for market surveillance purposes. Trace can be defined as a small quantity of an impurity in the finished product, where the impurity is an unintended contaminant in raw materials. More information on GMP can be found in the standard EN-ISO 22716.

In the safety assessment process it should be noted that the Toy Safety Directive does not provide any automatic allowance to use fragrances just because they are "natural". Natural fragrances may potentially contain one or more of the prohibited fragrance substances listed in the new TSD in which case they will be subject to restrictions.



PARTICULAR CASE OF PRESERVATIVES

Preservatives are generally added to toys containing aqueous liquids or those that may be considered to be a growth medium for micro-organisms as for example in finger paints, modelling clays, and soap bubbles and paint tablets intended to be used with water.

Liquid toys based on organic solvents do not require preservatives to be added. Without preservation, contamination of the toy materials with micro-organisms may occur during their shelf life but can also be generated by the user and its environment.

The use of preservatives allows manufacturers to ensure the Toy Safety Directive hygiene requirement is met, that requires that all toys must be designed and manufactured in such a way as to meet hygiene and cleanliness requirements in order to avoid any risk of infection, sickness or contamination.

Appendix C of the Toy Safety Directive includes restrictions on preservatives in toys intended for use by children under 36 months or in other toys intended to be placed in the mouth

The TSD appendix C restrictions regarding preservatives shall be considered even if the toy does not enter into the scope of this restriction (e.g. a toy intended for children over 3).

The EN 71-5 (safety requirements for chemical toys (sets) other than experimental (chemistry sets)) or EN 71-7 (safety requirements for finger paints) can be considered.

->preservatives requirements for a similar category of toy materials with a similar exposure scenario (including the age grade of the toy)

The presence of intentionally added preservatives in water-based toy materials shall be subject to a safety assessment (<u>Toxicological safety assessment</u> so called <u>TRA</u>) The use of the preservative must not pose a risk under normal and foreseeable conditions of use.

Substance name	CAS	Limit value Toy Directive Appendix C (*)	CLP Specific concentration limits for Mixture classification	CLP Specific concentration limits for Mixture Labelling
1,2-benzisothiazol-3(2H)-one (BIT)	2634-33-5	5 mg/kg	500 mg/kg	50 mg/kg
5-Chloro-2-methyl-isothiazolin-3(2H)-one (CMIT) (**)	26172-55-4	0,75 mg/kg	1000 mg/kg	100 mg/kg
2-methylisothiazolin-3(2H)-one (MIT)	2682-20-4	0,25 mg/kg	15 mg/kg	1,5 mg/kg
reaction mass of: 5-chloro-2- methyl-4-isothiazolin- 3-one [EC no. 247-500-7] and 2-methyl-2H -iso thiazol-3-one [EC no. 220-239-6] (3:1) (CMI-MI)	55965-84-9	l mg/kg	15 mg/kg	1,5 mg/kg

SPECIAL ATTENTION FOR ISOTHIAZOLINONE

(*) Appendix C to Annex II to Directive 2009/48/EC: Toys which are intended for children under 36 months and in other toys intended to be placed in the mouth. (**) Harmonized classification in-process

GENERAL PRODUCT SAFETY

- Caps for writing and marking instruments intended for use by children up to 14 years of age must be ventilated



according to requirement of ISO 11540.

- Article shall not have aggressive pointed or sharped design.
- Accessible edges shall not present unreasonable risk of injury taking into account the foreseeable using of the article.

COMPLIANCE

- SVHC analyse (Candidate List of substances of very high concern) The product mustn't contain any SVHC substances in accordance with REACH regulation (Limit <0,1% w/w) Refer to candidate list website: <u>https://echa.europa.eu/candidate-list-table</u>
- Total Cadmium content (Annex XVII-Entry 23 of Reglement REACH n°1907/2006)
- Total Phthalates content (Annex XVII-Entry 51-52 + Annex XIV of Reglement REACH n°1907/2006)
- For wood pencil/article PCP–Pentachlorophenol (Annex XVII du Reglement REACH n°1907/2006)
- Benzene content (Annex XVII-Entry 05 of Reglement REACH n°1907/2006) ->requested only if solvant
- Toluene content (Annex XVII-Entry 48 of Reglement REACH n°1907/2006) ->requested only if solvant
- Lead restriction (Annex XVII-Entry 63 of Reglement REACH n°1907/2006)
- Organotin content (Annex XVII-Entry 20 of Reglement REACH n°1907/2006) Requested for accessible soft plastic components and rubber components, painted and coated surfaces, textiles made of synthetic fibre, coated leather and for mixtures.
- 15PAHs Polycyclic aromatic hydrocarbon (German AfPS GS 2019:01 PAK)
- SCCP (POP Régulation n° 2019/1021 /CE)
- EN 71-1 Mechanical & physical properties
- EN 71-2 Inflammability
- EN 71-3 Migration of certain elements
- EN 71-7 Finger paints
- EN71-9 Organic chemical compounds
- FORMALDEHYDE according to DIRECTIVE (EU) 2019/1929 concerning specific limit values for chemicals used in certain toys

Substance	CAS No	Limit value
Formaldehyde	50-00-0	1,5 mg/l (migration limit) in polymeric toy material 0,1 ml/m ³ (emission limit) in resin-bonded wood toy material 30 mg/kg (content limit) in textile toy material 30 mg/kg (content limit) in leather toy material 30 mg/kg (content limit) in paper toy material 10 mg/kg (content limit) in water-based toy material

PHENOL according to DIRECTIVE (EU) 2017/774 of 3 May 2017 (Appendix C to Annex II to Directive 2009/48/EC)



FOR ARTICLE THAT CONTAIN A MIXTURE OR PREPARATION

- **TRA =** UE Toxicological Risk Assessments
- TRA = US / CA Toxicological Risk Assessments (if requested)
- MICROBIOLOGICAL TEST (Toys regulation)
 ->EC-type approval Protocol No 2: Microbiological safety of toys containing aqueous media (Rev 4) NB-TOYS/2021-053
 January 2022
- MICROBIOLOGICAL TEST
 ->US-16 CFR (Code of Federal Regulations) 1500.3 (if requested)

SPECIAL ATTENTION

-Allegations / use of allegations

Allegations must be accurate, based on established, precise checking methods and checking protocols Ex: ultrawashability function, coloring distance, cap off time...

Supplier Name:

Supplier Contact / Position:

Date:

Signature / Stamp:



REGULATORY REQUIREMENT – SPECIFICATIONS

Exigences Spécifications Règlementaires

CREATIV PRODUCT CATEGORY

Play and creations, manual activities, creative kits and games...

(Applicable for products which are classified as toys)

Revision	Date	Modification
01	2022-01-03	Creation - PG

GENERAL SPECIFICATIONS - LEGAL REQUIREMENTS

REACH regulation N°1907/2006 (EC) Registration, Evaluation, Authorisation and Restriction of Chemicals Regulation of the European Union, adopted to improve the protection of human health and the environment from the risks that can be posed by chemicals. REACH Registration of substances in Import Business: The supplier of substances and substances in mixtures in bulk has to prove that all substances are already registered at the ECHA (European Chemical Agency). Substances and mixtures are allowed to be imported only if the substances are verifiable registered by supplier/manufacturer. It is not permitted to import substances into the EC without ECHA registration. CLP regulation N°1272/2008 (EC) Regulation on classification, labelling and packaging of substances and mixtures. For substance/mixture, raw materials, MSDS (Material Safety Data Sheet) <3 years old, must be in compliance with Regulation REACH N°1907/2006 (EC) and CLP N°1272/2008 (EC) Regulation on classification, labelling and packaging of substances and mixtures REACH Guidance for MSDS: https://echa.europa.eu/-/guidance-on-the-compilation-of-safety-data-sheets Guide on the compilation of safety data sheets: Clic here Substances subjected to authorisation (REACH - Annex 14) are forbidden. List on this web link https://echa.europa.eu/authorisation-list Directive on the safety of toys 2009/48/EC Toy definition art.2.1: products designed or intended, whether or not exclusively, for use in play by children under 14 years of age. General product safety directive 2001/95/EC Directive on packaging and packaging waste 94/62/EC Biocide Regulation (EU) No 528/2012 concerning the making available on the market and use of biocidal products Articles delivered to MAPED must not contain substances TiO2 (CAS 13463-67-7) in powder form containing 1% or more of particles with a diameter ≤10 µm and classified as Carcinogenic 2 in concentration upper 1%. The use of dimethylfumarate (DMF) & Silica Gel is forbidden.



SPECIFIC REQUIREMENTS

- Chemical test must be realised with finished produced articles or components; not with raw materials.
- Testing laboratories must be an accredited laboratory according to ISO 17025 for the scope of their performed tests.
- Supplier has to make sure to have an appropriate traceability according to Maped Quality specification
- Products must have an neutral odour. The goods with a strange smell or a smell that indicates an improper production, storage will not be accepted
- Technical documentation required like MSDS, Toxical Risk Assessment, self-declaration... must be available in English language and has to be clearly refer to the goods.
- Toys products must be tested according to EN 71 standards under their last harmonized version including EN 71 parts 9 when requested.
- For Germany, ink require = Classification of substances hazardous to waters (Self assessment)
 Classification is carried out on the basis of the Ordinance on facilities for handling substances that are hazardous to water (Verordnung über Anlagen zum Umgang mit wassergefährdenden Stoffen (AwSV)) of 18 April 2017 (BGBI 2017, Teil I, Nr. 22, Seite 905).

This classification index must be noticed on the ink MSDS

CHEMICAL REQUIREMENTS – ANNEX II – III OF THE TOYS DIRECTIVE 2009/48/EC

– <u>CMR SUBSTANCES</u>

CMRs are prohibited according to the new Toy Safety Directive but may, however, be used if they are inaccessible to children in any form, including by inhalation, or if they are present in concentrations equal to or smaller than the relevant concentrations for classification of mixtures containing the substances, in accordance with Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP).

It is therefore necessary as part of a chemical safety assessment, to determine whether or not a substance of interest has the formal classification of CMR. This is carried out in the characterization stage of the chemical safety assessment.

The number of substances classified as CMRs is very high and it is therefore not feasible to test for the presence of all these. Instead, the safety assessment is used.

REACH – Annex XVII – Entry 28 to 30 CMR

- o Entry28: https://echa.europa.eu/documents/10162/eb55fb62-09dc-2b02-06e0-3de43590cb97
- o Entry29: https://echa.europa.eu/documents/10162/fd311fbb-0127-7043-0db5-04d31dece50a
- o Entry30: <u>https://echa.europa.eu/documents/10162/8700b18c-42ff-51ef-2160-72e14ac7268d</u>

– FRAGRANCES REQUIREMENTS

The Toy Safety Directive lists a number of allergenic fragrances, defined by CAS numbers, that are prohibited for use in toys and also a number of fragrances that when used require special labelling of the toy. The safety assessment should check that the toy complies with these requirements.

Traces of a fragrance are allowed provided that their presence is technically unavoidable in good manufacturing practise (GMP) and does not exceed 100 mg/kg. The 100 mg/kg limit is per fragrance substance. The manufacturer should not intentionally use these prohibited fragrances. The limit of 100 mg/kg has been set for market surveillance purposes. Trace can be defined as a small quantity of an impurity in the finished product, where the impurity is an unintended contaminant in raw materials. More information on GMP can be found in the standard EN-ISO 22716.

In the safety assessment process it should be noted that the Toy Safety Directive does not provide any automatic allowance to use fragrances just because they are "natural". Natural fragrances may potentially contain one or more of the prohibited fragrance substances listed in the new TSD in which case they will be subject to restrictions.



– PARTICULAR CASE OF PRESERVATIVES

Preservatives are generally added to toys containing aqueous liquids or those that may be considered to be a growth medium for micro-organisms as for example in finger paints, modelling clays, and soap bubbles and paint tablets intended to be used with water.

Liquid toys based on organic solvents do not require preservatives to be added. Without preservation, contamination of the toy materials with micro-organisms may occur during their shelf life but can also be generated by the user and its environment.

The use of preservatives allows manufacturers to ensure the Toy Safety Directive hygiene requirement is met, that requires that all toys must be designed and manufactured in such a way as to meet hygiene and cleanliness requirements in order to avoid any risk of infection, sickness or contamination.

Appendix C of the Toy Safety Directive includes restrictions on preservatives in toys intended for use by children under 36 months or in other toys intended to be placed in the mouth

The TSD appendix C restrictions regarding preservatives shall be considered even if the toy does not enter into the scope of this restriction (e.g. a toy intended for children over 3).

The EN 71-5 (safety requirements for chemical toys (sets) other than experimental (chemistry sets)) or EN 71-7 (safety requirements for finger paints) can be considered.

->preservatives requirements for a similar category of toy materials with a similar exposure scenario (including the age grade of the toy)

The presence of intentionally added preservatives in water-based toy materials shall be subject to a safety assessment (<u>Toxicological safety assessment</u> so called <u>TRA</u>) The use of the preservative must not pose a risk under normal and foreseeable conditions of use.

- SPECIAL ATTENTION FOR ISOTHIAZOLINONE				
Substance name	CAS	Limit value Toy Directive Appendix C (*)	CLP Specific concentration limits for Mixture classification	CLP Specific concentration limits for Mixture Labelling
1,2-benzisothiazol-3(2H)-one (BIT)	2634-33-5	5 mg/kg	500 mg/kg	50 mg/kg
5-Chloro-2-methyl-isothiazolin-3(2H)-one (CMIT) (**)	26172-55-4	0,75 mg/kg	1000 mg/kg	100 mg/kg
2-methylisothiazolin-3(2H)-one (MIT)	2682-20-4	0,25 mg/kg	15 mg/kg	1,5 mg/kg
reaction mass of: 5-chloro-2- methyl-4-isothiazolin- 3-one [EC no. 247-500-7] and 2-methyl-2H -iso thiazol-3-one [EC no. 220-239-6] (3:1) (CMI-MI)	55965-84-9	1 mg/kg	15 mg/kg	1,5 mg/kg

SPECIAL ATTENTION FOR ISOTHIAZOLINONE

(*) *Appendix C to Annex II to Directive 2009/48/EC*: Toys which are intended for children under 36 months and in other toys intended to be placed in the mouth.

(**) Harmonized classification in-process



GENERAL PRODUCT SAFETY

- Caps for writing, colouring and marking instruments intended for use by children up to 14 years of age must be ventilated according to requirement of ISO 11540.
- Article shall not have aggressive pointed or sharped design.
- Accessible edges shall not present unreasonable risk of injury taking into account the foreseeable using of the article.

COMPLIANCE

- SVHC analyse (Candidate List of substances of very high concern) The product mustn't contain any SVHC substances in accordance with REACH regulation (Limit <0,1% w/w) Refer to candidate list website: <u>https://echa.europa.eu/candidate-list-table</u>
- Total Cadmium content (Annex XVII-Entry 23 of Reglement REACH n°1907/2006)
- Total Phthalates content (Annex XVII-Entry 51-52 + Annex XIV of Reglement REACH n°1907/2006)
- For wood pencil/article PCP–Pentachlorophenol (Annex XVII du Reglement REACH n°1907/2006)
- Benzene content (Annex XVII-Entry 05 of Reglement REACH n°1907/2006) ->requested only if solvant
- Toluene content (Annex XVII-Entry 48 of Reglement REACH n°1907/2006) ->requested only if solvant
- Lead restriction (Annex XVII-Entry 63 of Reglement REACH n°1907/2006)
- Nickel (Annex XVII-Entry 27 of Reglement REACH n°1907/2006) Concern metallic part with skin contact
- Organotin content (Annex XVII-Entry 20 of Reglement REACH n°1907/2006) Requested for accessible soft plastic components and rubber components, painted and coated surfaces, textiles made of synthetic fibre, coated leather and for mixtures.
- 15PAHs Polycyclic aromatic hydrocarbon (German AfPS GS 2019:01 PAK)
- SCCP (POP Régulation n° 2019/1021 /CE)
- EN 71-1 Mechanical & physical properties
- EN 71-2 Inflammability
- EN 71-3 Migration of certain elements
- EN71-5 Chemical toys (sets) other than experimental sets
- EN 71-7 Finger paints
- EN71-9 Organic chemical compounds
- EN 71-12 N-Nitrosamines and N-nitrosatable substances
- FORMAMIDE according to DIRECTIVE (UE) 2015/2115 concerning specific limit values for chemicals used in certain toys (Appendix C to Annex II to Directive 2009/48/EC)



Substance	CAS No	Limit value
'Formamide	75-12-7	$20 \ \mu g/m^3$ (emission limit) after a maximum of 28 days from commencement of the emission testing of foam toy materials containing more than 200 mg/kg (cut-off limit based on content).'

FORMALDEHYDE according to DIRECTIVE (EU) 2019/1929 concerning specific limit values for chemicals used in certain toys (Appendix C to Annex II to Directive 2009/48/EC)

Substance	CAS No	Limit value
Formaldehyde	50-00-0	1,5 mg/l (migration limit) in polymeric toy material 0,1 ml/m ³ (emission limit) in resin-bonded wood toy material 30 mg/kg (content limit) in textile toy material 30 mg/kg (content limit) in leather toy material 30 mg/kg (content limit) in paper toy material 10 mg/kg (content limit) in water-based toy material

PHENOL according to DIRECTIVE (EU) 2017/774 concerning specific limit values for chemicals used in certain toys (Appendix C to Annex II to Directive 2009/48/EC)

Substance	CAS No	Limit value
'Phenol	108-95-2	5 mg/l (migration limit) in polymeric materials in accordance with the methods laid down in EN 71-10:2005 and EN 71-11:2005.
		10 mg/kg (content limit) as a preservative in accordance with the methods laid down in EN 71-10:2005 and EN 71-11:2005.'

BISPHENOL A according to DIRECTIVE (EU) 2017/898 concerning specific limit values for chemicals used in certain toys (Appendix C to Annex II to Directive 2009/48/EC)

Bisphenol A	80-05-7	0,04 mg/l (migration limit) in accordance with the methods laid down in EN 71-10:2005 and EN 71-11:2005.'
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TCEP-TCPP-TDCP according to DIRECTIVE (EU) 2014/79 concerning specific limit values for chemicals used in certain toys (Appendix C to Annex II to Directive 2009/48/EC)

Substance	CAS No	Limit value
ТСЕР	115-96-8	5 mg/kg (content limit)
TCPP	13674-84-5	5 mg/kg (content limit)
TDCP	13674-87-8	5 mg/kg (content limit)'

FOR ELECTRICAL ARTICLE

- Article shall not have aggressive pointed or sharped design. Accessible edges shall not present unreasonable risk
 of injury taking into account the foreseeable using of the article.
- Electric article must be designed in such a way to ensure the maximum temperature reached by any accessible surface would not cause burns.
- Electric article must be designed such that any generated electric, magnetic and electromagnetic fields are limited and must operate at a safe level.
- Batteries shall not be removable without the aid of a tool. If screws or similar fasteners are used to secure a door
 or cover providing access to the battery compartment, the screw or similar fastener shall be captive to ensure that
 they remain with the door, cover or equipment.
- RISK ASSESSMENT must be carried out.



COMPLIANCE

- RoHS Directive 2011/65/EU + 2015/863/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment
- Electro Magnetic Compatibility Directive 2014/30/EU
 - EN 61000-6-3 Generic standard Emission
 - EN 61000-6-1 Generic standard Immunity
- General Product Safety Directive 2001/95/CE
 - EN 62233 Measurement methods for electromagnetic fields of household appliances and similar apparatus with regard to human exposure (if requested)
- EN 62115 Toy Electrical Standard (if requested)
 - \circ Note for LEDs

LEDs evaluation is included in the EN 62115 (annexe E). Standard define that LEDs must be in compliance with laser class 1 according to IEC 60825-1

- IEC 61558 Safety of power transformers, power supplies and similar products
- Maped is member of the "Eco-System" organism relating to the collecting of the waste electrical and electronic (WEEE).

An Eco contribution is applied per product distribute in France Area (France + Réunion, Guyane, Guadeloupe, Martinique, Mayotte)

- Marking on article, packaging, notice

FOR CANDLE ACTIVITY

- EN 15493: Candles. Specification for fire safety
- EN 15494 : Candles. Product safety labels
- EN 15426: : Candles. Specification for sooting behaviour

FOR ARTICLE THAT CONTAIN A MIXTURE OR PREPARATION

- **TRA =** UE Toxicological Risk Assessments
- **TRA** = US / CA Toxicological Risk Assessments (if requested)
- MICROBIOLOGICAL TEST (Toys regulation)
 ->EC-type approval Protocol No 2: Microbiological safety of toys containing aqueous media (Rev 4) NB-TOYS/2021-053
 January 2022
- MICROBIOLOGICAL TEST

->US-16 CFR (Code of Federal Regulations) 1500.3 (if requested)

SPECIAL ATTENTION

- Allegations / use of allegations

Allegations must be accurate, based on established, precise checking methods and checking protocols Ex: ultrawashability function, coloring distance, cap off time...

Supplier Name:

Supplier Contact / Position:

Date:

Signature / Stamp:



REGULATORY REQUIREMENT – SPECIFICATIONS

Exigences Spécifications Règlementaires

STATIONERY PRODUCT CATEGORY

Compass, tracing range, eraser, scissors, stapler, puncher, pencil sharpener ...

(Applicable for products which are not classified as toys)

Revision	Date	Modification
01	2022-01-03	Creation - PG

GENERAL SPECIFICATIONS - LEGAL REQUIREMENTS

 REACH regulation N°1907/2006 (EC) Registration, Evaluation, Authorisation and Restriction of Chemicals Regulation of the European Union, adopted to improve the protection of human health and the environment from the risks that can be posed by chemicals. REACH Registration of substances in Import Business: The supplier of substances and substances in mixtures in bulk has to prove that all substances are already registered at the ECHA (European Chemical Agency). Substances and mixtures are allowed to be imported only if the substances are verifiable registered by supplier/manufacturer. It is not permitted to import substances into the EC without ECHA registration.
 CLP regulation N°1272/2008 (EC) Regulation on classification, labelling and packaging of substances and mixtures.
 For substance/mixture, raw materials, MSDS (Material Safety Data Sheet) <3 years old, must be in compliance with Regulation REACH N°1907/2006 (EC) and CLP N°1272/2008 (EC) Regulation on classification, labelling and packaging of substances and packaging of substances and mixtures

REACH Guidance for MSDS: <u>https://echa.europa.eu/-/guidance-on-the-compilation-of-safety-data-sheets</u> Guide on the compilation of safety data sheets: <u>Clic here</u>

- Substances subjected to authorisation (REACH Annex 14) are forbidden.
 List on this web link <u>https://echa.europa.eu/authorisation-list</u>
- General product safety directive 2001/95/EC
- Directive on packaging and packaging waste 94/62/EC
- Articles delivered to MAPED must not contain substances TiO2 (CAS 13463-67-7) in powder form containing 1% or more of particles with a diameter ≤10 µm and classified as Carcinogenic 2 in concentration upper 1%.

- The use of dimethylfumarate (DMF) & Silica Gel is forbidden.



SPECIFIC REQUIREMENTS

- Chemical test must be realised with finished produced articles or components; not with raw materials.
- Testing laboratories must be an accredited laboratory according to ISO 17025 for the scope of their performed tests.
- Supplier has to make sure to have an appropriate traceability according to Maped Quality specification
- Products must have a neutral odour. The goods with a strange smell or a smell that indicates an improper production, storage will not be accepted
- Technical documentation required like MSDS, Toxical Risk Assessment, self-declaration... must be available in English language and has to be clearly refer to the goods.
- For Germany, ink require = Classification of substances hazardous to waters (Self assessment)
 Classification is carried out on the basis of the Ordinance on facilities for handling substances that are hazardous to water (Verordnung über Anlagen zum Umgang mit wassergefährdenden Stoffen (AwSV)) of 18 April 2017 (BGBI 2017, Teil I, Nr. 22, Seite 905).
 This classification index must be noticed on the ink MSDS

CHEMICAL REQUIREMENTS

- CMR SUBSTANCES

CMRs are prohibited, however, be used if they are inaccessible to end user in any form, including by inhalation, or if they are present in concentrations equal to or smaller than the relevant concentrations for classification of mixtures containing the substances, in accordance with Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP).

It is therefore necessary as part of a chemical safety assessment, to determine whether or not a substance of interest has the formal classification of CMR. This is carried out in the characterization stage of the chemical safety assessment.

The number of substances classified as CMRs is very high and it is therefore not feasible to test for the presence of all these. Instead, the safety assessment is used.

- REACH - Annex XVII - Entry 28 to 30 CMR

- o Entry28: https://echa.europa.eu/documents/10162/eb55fb62-09dc-2b02-06e0-3de43590cb97
- o Entry29: <u>https://echa.europa.eu/documents/10162/fd311fbb-0127-7043-0db5-04d31dece50a</u>
- o Entry30: <u>https://echa.europa.eu/documents/10162/8700b18c-42ff-51ef-2160-72e14ac7268d</u>

– PARTICULAR CASE OF PRESERVATIVES

Preservatives are generally added to article containing aqueous liquids or those that may be considered to be a growth medium for micro-organisms.

Liquid based on organic solvents do not require preservatives to be added.

Without preservation, contamination of the materials with micro-organisms may occur during their shelf life but can also be generated by the user and its environment.

The use of preservatives allows manufacturers to ensure article hygiene requirement is met, that requires that all articles must be designed and manufactured in such a way as to meet hygiene and cleanliness requirements in order to avoid any risk of infection, sickness or contamination.

Supplier shall specify all preservative agents with - chemical name, - EG-No. and CAS-No,. - concentration in the article. No use of preservatives which require a pictogram or a physical hazard statement or health hazard statement according to CLP Regulation.



The presence of intentionally added preservatives in water-based materials shall be subject to a safety assessment (<u>Toxicological safety assessment</u> so called <u>TRA</u>) The use of the preservative must not pose a risk under normal and foreseeable conditions of use.

GENERAL PRODUCT SAFETY

- Article shall not have aggressive pointed or sharped design.
- Accessible edges shall not present unreasonable risk of injury taking into account the foreseeable using of the article.

COMPLIANCE

- SVHC analyse (Candidate List of substances of very high concern) The product mustn't contain any SVHC substances in accordance with REACH regulation (Limit <0,1% w/w) Refer to candidate list website: <u>https://echa.europa.eu/candidate-list-table</u>
- Total Cadmium content (Annex XVII-Entry 23 of Reglement REACH n°1907/2006)
- Total Phthalates content (Annex XVII-Entry 51-52 + Annex XIV of Reglement REACH n°1907/2006)
- Benzene content (Annex XVII-Entry 05 of Reglement REACH n°1907/2006) ->requested only if solvant
- Toluene content (Annex XVII-Entry 48 of Reglement REACH n°1907/2006) ->requested only if solvant
- Nickel (Annex XVII-Entry 27 of Reglement REACH n°1907/2006) Concern metallic part with skin contact
- Lead restriction (Annex XVII-Entry 63 of Reglement REACH n°1907/2006)
- Organotin content (Annex XVII-Entry 20 of Reglement REACH n°1907/2006) Requested for accessible soft plastic components and rubber components, painted and coated surfaces, textiles made of synthetic fibre, coated leather and for mixtures.
- 15PAHs Polycyclic aromatic hydrocarbon (German AfPS GS 2019:01 PAK)
- SCCP (POP Régulation n° 2019/1021 /CE)
- NONYLPHENOL : limit concentration must not exceed 0,01% max
 Limit applies to polymer materials (plastics, rubber, elastomer and coating) with prolonged contact to skin.
 Prolonged contact to skin: typically longer than 15 min per day.
 Method: Extraction with THF, determination EN ISO 18857-2.

FOR ARTICLE THAT CONTAIN A MIXTURE OR PREPARATION

- **TRA =** UE Toxicological Risk Assessments
- **TRA** = US / CA Toxicological Risk Assessments
- MICROBIOLOGICAL TEST (Toys regulation)
 ->EC-type approval Protocol No 2: Microbiological safety of toys containing aqueous media (Rev 4)
 NB-TOYS/2021-053 January 2022
- MICROBIOLOGICAL TEST
 ->US-16 CFR (Code of Federal Regulations) 1500.3



FOR ELECTRICAL ARTICLE

- Article shall not have aggressive pointed or sharped design. Accessible edges shall not present unreasonable risk of injury taking into account the foreseeable using of the article.
- Electric article must be designed in such a way to ensure the maximum temperature reached by any
 accessible surface would not cause burns.
- Electric article must be designed such that any generated electric, magnetic and electromagnetic fields are limited and must operate at a safe level.
- Batteries shall not be removable without the aid of a tool. If screws or similar fasteners are used to secure a
 door or cover providing access to the battery compartment, the screw or similar fastener shall be captive to
 ensure that they remain with the door, cover or equipment.
- RISK ASSESSMENT must be carried out.

COMPLIANCE

- RoHS Directive 2011/65/EU + 2015/863/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment
- Electro Magnetic Compatibility Directive 2014/30/EU
 - EN 61000-6-3 Generic standard Emission
 - o EN 61000-6-1 Generic standard Immunity
- General Product Safety Directive 2001/95/CE
 - EN 62233 Measurement methods for electromagnetic fields of household appliances and similar apparatus with regard to human exposure (if requested)
- EN 62115 Toy Electrical Standard (if requested)
 - Note for LEDs

LEDs evaluation is included in the EN 62115 (annexe E). Standard define that LEDs must be in compliance with laser class 1 according to IEC 60825-1

- Maped is member of the "Eco-System" organism relating to the collecting of the waste electrical and electronic (WEEE).
 An Eco contribution is applied per product distribute in France Area (France + Réunion, Guyane,
- Guadeloupe, Martinique, Mayotte)
- Marking on article, packaging, notice

SPECIAL ATTENTION

Allegations / use of allegations
 Allegations must be accurate, based on established, precise checking methods and checking protocols
 Ex: ultrawashability function, coloring distance, cap off time...

Product which inspires children to play with, must be classified as TOYS.
 Additional test reports are required which are not included in this document.
 This document is not applicable for such products.

Supplier Name:

Supplier Contact / Position:

Date:

Signature / Stamp:



REGULATORY REQUIREMENT – SPECIFICATIONS

Exigences Spécifications Règlementaires

WRITING PRODUCT CATEGORY

Ball pens, Fine liner pens, ...

(Applicable for products which are not classified as toys)

Revision	Date	Modification
01	2022-01-03	Creation - PG

GENERAL SPECIFICATIONS - LEGAL REQUIREMENTS

- REACH regulation N°1907/2006 (EC) Registration, Evaluation, Authorisation and Restriction of Chemicals Regulation of the European Union, adopted to improve the protection of human health and the environment from the risks that can be posed by chemicals.
 REACH Registration of substances in Import Business: The supplier of substances and substances in mixtures in bulk has to prove that all substances are already registered at the ECHA (European Chemical Agency). Substances and mixtures are allowed to be imported only if the substances are verifiable registered by supplier/manufacturer.
 It is not permitted to import substances into the EC without ECHA registration.
- CLP regulation N°1272/2008 (EC) Regulation on classification, labelling and packaging of substances and mixtures.
- For substance/mixture, raw materials, MSDS (Material Safety Data Sheet) <3 years old, must be in compliance with Regulation REACH N°1907/2006 (EC) and CLP N°1272/2008 (EC) Regulation on classification, labelling and packaging of substances and mixtures REACH Guidance for MSDS: <u>https://echa.europa.eu/-/guidance-on-the-compilation-of-safety-data-sheets</u> Guide on the compilation of safety data sheets: <u>Clic here</u>
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 List on this web link <u>https://echa.europa.eu/authorisation-list</u>
- General product safety directive 2001/95/EC
- Directive on packaging and packaging waste 94/62/EC
- Biocide Regulation (EU) No 528/2012 concerning the making available on the market and use of biocidal products
- Articles delivered to MAPED must not contain substances TiO2 (CAS 13463-67-7) in powder form containing 1% or more of particles with a diameter ≤10 µm and classified as Carcinogenic 2 in concentration upper 1%.
- The use of dimethylfumarate (DMF) & Silica Gel is forbidden.

SPECIFIC REQUIREMENTS



- Chemical test must be realised with finished produced articles or components; not with raw materials.
- Testing laboratories must be an accredited laboratory according to ISO 17025 for the scope of their performed tests.
- Supplier has to make sure to have an appropriate traceability according to Maped Quality specification
- Products must have an neutral odour. The goods with a strange smell or a smell that indicates an improper production, storage will not be accepted
- Technical documentation required like MSDS, Toxical Risk Assessment, self-declaration... must be available in English language and has to be clearly refer to the goods.
- For Germany, ink require = Classification of substances hazardous to waters (Self assessment)
 Classification is carried out on the basis of the Ordinance on facilities for handling substances that are hazardous to water (Verordnung über Anlagen zum Umgang mit wassergefährdenden Stoffen (AwSV)) of 18 April 2017 (BGBI 2017, Teil I, Nr. 22, Seite 905).
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CHEMICAL REQUIREMENTS

- CMR SUBSTANCES

CMRs are prohibited, however, be used if they are inaccessible to end user in any form, including by inhalation, or if they are present in concentrations equal to or smaller than the relevant concentrations for classification of mixtures containing the substances, in accordance with Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP).

It is therefore necessary as part of a chemical safety assessment, to determine whether or not a substance of interest has the formal classification of CMR. This is carried out in the characterization stage of the chemical safety assessment.

The number of substances classified as CMRs is very high and it is therefore not feasible to test for the presence of all these. Instead, the safety assessment is used.

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- o Entry28: https://echa.europa.eu/documents/10162/eb55fb62-09dc-2b02-06e0-3de43590cb97
- o Entry29: https://echa.europa.eu/documents/10162/fd311fbb-0127-7043-0db5-04d31dece50a
- o Entry30: https://echa.europa.eu/documents/10162/8700b18c-42ff-51ef-2160-72e14ac7268d

- PARTICULAR CASE OF PRESERVATIVES

Preservatives are generally added to article containing aqueous liquids or those that may be considered to be a growth medium for micro-organisms.

Liquid based on organic solvents do not require preservatives to be added.

Without preservation, contamination of the materials with micro-organisms may occur during their shelf life but can also be generated by the user and its environment.

The use of preservatives allows manufacturers to ensure article hygiene requirement is met, that requires that all articles must be designed and manufactured in such a way as to meet hygiene and cleanliness requirements in order to avoid any risk of infection, sickness or contamination.

Supplier shall specify all preservative agents with - chemical name, - EG-No. and CAS-No,. - concentration in the article. No use of preservatives which require a pictogram or a physical hazard statement or health hazard statement according to CLP Regulation.

The presence of intentionally added preservatives in water-based materials shall be subject to a safety assessment (<u>Toxicological safety assessment</u> so called <u>TRA</u>)



The use of the preservative must not pose a risk under normal and foreseeable conditions of use.

GENERAL PRODUCT SAFETY

- Caps for writing and marking instruments intended for use by children up to 14 years of age must be ventilated according to requirement of ISO 11540.
- Article shall not have aggressive pointed or sharped design.
- Accessible edges shall not present unreasonable risk of injury taking into account the foreseeable using of the article.

COMPLIANCE

- SVHC analyse (Candidate List of substances of very high concern) The product mustn't contain any SVHC substances in accordance with REACH regulation (Limit <0,1% w/w) Refer to candidate list website: <u>https://echa.europa.eu/candidate-list-table</u>
- Total Cadmium content (Annex XVII-Entry 23 of Reglement REACH n°1907/2006)
- Total Phthalates content (Annex XVII-Entry 51-52 + Annex XIV of Reglement REACH n°1907/2006)
- Benzene content (Annex XVII-Entry 05 of Reglement REACH n°1907/2006) ->requested only if solvant
- Toluene content (Annex XVII-Entry 48 of Reglement REACH n°1907/2006) ->requested only if solvant
- Nickel (Annex XVII-Entry 27 of Reglement REACH n°1907/2006) Concern metallic part with skin contact
- Lead restriction (Annex XVII-Entry 63 of Reglement REACH n°1907/2006)
- Organotin content (Annex XVII-Entry 20 of Reglement REACH n°1907/2006) Requested for accessible soft plastic components and rubber components, painted and coated surfaces, textiles made of synthetic fibre, coated leather and for mixtures.
- 15PAHs Polycyclic aromatic hydrocarbon (German AfPS GS 2019:01 PAK)
- SCCP (POP Régulation n° 2019/1021 /CE)

FOR ARTICLE THAT CONTAIN A MIXTURE OR PREPARATION

- TRA = UE Toxicological Risk Assessments
- **TRA** = US / CA Toxicological Risk Assessments
- MICROBIOLOGICAL TEST (Toys regulation)
 ->EC-type approval Protocol No 2: Microbiological safety of toys containing aqueous media (Rev 4)
 NB-TOYS/2021-053 January 2022
- MICROBIOLOGICAL TEST
 ->US-16 CFR (Code of Federal Regulations) 1500.3

SPECIAL ATTENTION

Allegations / use of allegations
 Allegations must be accurate, based on established, precise checking methods and checking protocols
 Ex: ultrawashability function, coloring distance, cap off time...

Supplier Name:

Supplier Contact / Position:

Date:

Signature / Stamp:



REGULATORY REQUIREMENT – SPECIFICATIONS

Exigences Spécifications Règlementaires

FOOD CONTACT PRODUCT CATEGORY

Water bottle, Lunch box, Lunch bag, Mug..

Revision	Date	Modification
01	2022-01-03	Creation - PG

GENERAL SPECIFICATIONS - LEGAL REQUIREMENTS

- REACH regulation N°1907/2006 (EC) Registration, Evaluation, Authorisation and Restriction of Chemicals Regulation of the European Union, adopted to improve the protection of human health and the environment from the risks that can be posed by chemicals. REACH Registration of substances in Import Business: The supplier of substances and substances in mixtures in bulk has to prove that all substances are already registered at the ECHA (European Chemical Agency). Substances and mixtures are allowed to be imported only if the substances are verifiable registered by supplier/manufacturer. It is not permitted to import substances into the EC without ECHA registration. CLP regulation N°1272/2008 (EC) Regulation on classification, labelling and packaging of substances and mixtures. For substance/mixture, raw materials, MSDS (Material Safety Data Sheet) <3 years old, must be in compliance with Regulation REACH N°1907/2006 (EC) and CLP N°1272/2008 (EC) Regulation on classification, labelling and packaging of substances and mixtures REACH Guidance for MSDS: https://echa.europa.eu/-/guidance-on-the-compilation-of-safety-data-sheets Guide on the compilation of safety data sheets: Clic here Substances subjected to authorisation (REACH – Annex 14) are forbidden. List on this web link https://echa.europa.eu/authorisation-list General product safety directive 2001/95/EC
- Directive on packaging and packaging waste 94/62/EC
- Articles delivered to MAPED must not contain substances TiO2 (CAS 13463-67-7) in powder form containing 1% or more of particles with a diameter ≤10 µm and classified as Carcinogenic 2 in concentration upper 1%.
- The use of dimethylfumarate (DMF) & Silica Gel is forbidden.



GENERAL SPECIFICATIONS - LEGISLATION

- **REGULATION (EC) No 1935/2004** relating to materials and articles intended to come into contact with food
 - The products must be safe to human health.
 - Regulation (EC) 1935/2004 establishes different groups of materials and articles which may be covered by specific measures.
 - A declaration of compliance has to be provided by the factory (model is available in Maped France).
 - Traceability: Supplier has to make sure to have an appropriate traceability according to Maped Quality specification

Q"

- The logo XT must be present on the product (it is not an obligation if article is clearly intended for food contact)
- **REGULATION (EU) 10/2011** relating to plastic materials and articles intended to come into contact with food
- **DIRECTIVE 84/500/EEC** relating to ceramic articles intended to come into contact with food
- DIRECTIVE 2007/42/EC relating to materials and articles made of regenerated cellulose film intended to come into contact with food
- DIRECTIVE 93/11/EEC relating to the release of the N-nitrosamines and N- nitrosatable substances from elastomer or rubber teats and soothers
- REGULATION (EC) 1895/2005 relating of use of certain epoxy derivatives in materials and articles intended to come into contact with food
- REGULATION (EC) 282/2008 relating to recycled plastic materials and articles intended to come into contact with food
- REGULATION (EC) No 2023/2006 relating to good manufacturing practice for materials and articles intended to come into contact with food The company must have a quality insurance system including incoming inspection, checking protocols in the production site, etc...

SPECIFIC REQUIREMENTS

- Chemical test must be realised on finished produced articles or part of the finish product.
- Testing laboratories must be an accredited <u>international laboratory</u> according to ISO 17025 for the scope of their performed tests.
- Products must have a neutral odour. The goods with a strange smell or a smell that indicates an improper production, storage will not be accepted
- Technical documentation required like MSDS, Toxical Risk Assessment, self-declaration... must be available in English language and has to be clearly refer to the goods.



CHEMICAL REQUIREMENTS

- CMR SUBSTANCES

CMRs are prohibited, however, be used if they are inaccessible to end user in any form, including by inhalation, or if they are present in concentrations equal to or smaller than the relevant concentrations for classification of mixtures containing the substances, in accordance with Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP).

It is therefore necessary as part of a chemical safety assessment, to determine whether or not a substance of interest has the formal classification of CMR. This is carried out in the characterization stage of the chemical safety assessment.

The number of substances classified as CMRs is very high and it is therefore not feasible to test for the presence of all these. Instead, the safety assessment is used.

- REACH – Annex XVII – Entry 28 to 30 CMR

- o Entry28: https://echa.europa.eu/documents/10162/eb55fb62-09dc-2b02-06e0-3de43590cb97
- o Entry29: https://echa.europa.eu/documents/10162/fd311fbb-0127-7043-0db5-04d31dece50a
- o Entry30: <u>https://echa.europa.eu/documents/10162/8700b18c-42ff-51ef-2160-72e14ac7268d</u>

GENERAL PRODUCT SAFETY

- Article shall not have aggressive pointed or sharped design
- Accessible edges shall not present unreasonable risk of injury taking into account the foreseeable using of the article.

COMPLIANCE

- SVHC analyse (Candidate List of substances of very high concern) The product mustn't contain any SVHC substances in accordance with REACH regulation (Limit <0,1% w/w) Refer to candidate list website: <u>https://echa.europa.eu/candidate-list-table</u>
- EN71-1 concerning Physical & Mechanical properties (Toys safety directive) can be requested if article is intended to be used by children or put in the mouth.
- Total Cadmium content (Annex XVII-Entry 23 of Reglement REACH n°1907/2006)
- Total Phthalates content (Annex XVII-Entry 51-52 + Annex XIV of Reglement REACH n°1907/2006)
- Nickel (Annex XVII-Entry 27 of Reglement REACH n°1907/2006) Concern metallic part with skin contact
- Lead restriction (Annex XVII-Entry 63 of Reglement REACH n°1907/2006)
- Organotin content (Annex XVII-Entry 20 of Reglement REACH n°1907/2006) Requested for accessible soft plastic components and rubber components, painted and coated surfaces, textiles made of synthetic fibre, coated leather and for mixtures.
- Azodye (Annex XVII Entry 43 of Regulation REACH n°1907/2006 on textile part)
- 15PAHs Polycyclic aromatic hydrocarbon (German AfPS GS 2019:01 PAK)
- SCCP (POP Régulation n° 2019/1021 /CE)
- NONYLPHENOL : limit concentration must not exceed 0,01% max Limit applies to polymer materials (plastics, rubber, elastomer and coating) with prolonged contact to skin. Prolonged contact to skin: typically longer than 15 min per day. Method: Extraction with THF, determination EN ISO 18857-2.



Lab tests Analysis			
Country	Test designation	Material	
UE	Overall migration - Directive 85/572/CE	SILICON PART	
UE	Sensory test - Regulation 10/2011/UE	SILICON PART	
FR	Content of free volatile organic materials by French Decree of 25/11/1992	SILICON PART	
FR	Residual peroxides according to the 5th edition of the European Pharmacopoeia by French decree of 25/11/1992	SILICON PART	
FR	Specific migration of organotin - French Decree of 25/11/1992	SILICON PART	
DE	Extractable components - LFGB	SILICON PART	
USA	Net chloroform soluble extractives for (water)-FDA 177.1210	SILICON PART	
UE	Overall migration - Regulation 10/2011/UE (EN 1186)	TRITAN	
UE	Specific migration of heavy metals - Regulation 10/2011/UE (EN 13130)	TRITAN	
UE	Specific migration of TMCD in 20% ethanol	TRITAN	
UE	Specific migration of phthalate (DBP, BBP, DEHP, DINP, DIDP, DAP) - Regulation 10/2011/UE	TRITAN	
FR	Bisphenol A content French law 2012-1442 of 24 Dec 2012	TRITAN	
UE	Overall migration - Regulation 10/2011/UE (EN 1186)	РР	
UE	Specific migration of heavy metals - Regulation 10/2011/UE (EN 13130)	PP	
UE	Specific migration of primary aromatic amines (PAA) - Regulation 10/2011/UE	РР	
UE	Specific migration of phthalate (DBP, BBP, DEHP, DINP, DIDP, DAP) - Regulation 10/2011/UE	PP	
FR	Bisphenol A content French law 2012-1442 of 24 Dec 2012	РР	
USA	Density - FDA CFR 21 177.1520	PP	
USA	Melting point (only for PP) - FDA CFR 21 177.1520	PP	
USA	N-hexane extractives - FDA CFR 21 177.1520	PP	
USA	Xylene extractives - FDA CFR 21 177.1520	PP	
UE	Extractable heavy metal (21 elements) in 0.5% citric acid CM/RES(2013)9	STAINLESS STEEL	
DE	Sensory test - LFGB	STAINLESS STEEL	
FR	Metal composition test (Cr,Ta, Nb, Zr, Mo, Ti, Al, Cu)	STEEL STAINLESS STEEL	
IT	Overall migration in 3% acetic acid	STEEL	
IT	Extractable Ni, Cr, Mn	STAINLESS STEEL	
USA	Cr Content - FDA GRAS requirement	STAINLESS STEEL	
UE	Overall migration - Regulation 10/2011/UE (EN 1186)	PE	
UE	Specific migration of heavy metals - Regulation 10/2011/UE (EN 13130)	PE	
UE	Specific migration of primary aromatic amines (PAA) - Regulation 10/2011/UE	PE	
UE	Specific migration of phthalate (DBP, BBP, DEHP, DINP, DIDP, DAP) - Regulation 10/2011/UE	PE	
FR	Bisphenol A content French law 2012-1442 of 24 Dec 2012	PE	
USA	Density - FDA CFR 21 177.1520	PE	
USA	Melting point (only for PP) - FDA CFR 21 177.1520	PE	
USA	N-hexane extractives - FDA CFR 21 177.1520	PE	
USA	Xylene extractives - FDA CFR 21 177.1520	PE	



UE	Overall migration - Regulation 10/2011/UE (EN 1186)	ABS
UE	Specific migration of primary aromatic amines (PAA) - Regulation 10/2011/UE	ABS
UE	Specific migration of phthalate (DBP, BBP, DEHP, DINP, DIDP, DAP) - Regulation 10/2011/UE	ABS
UE	Specific migration of butadiene - Regulation 10/2011/UE	ABS
UE	Specific migration of acrylonitril - Regulation 10/2011/UE	ABS
UE	Butadiene content - Regulation 10/2011/UE	ABS
FR	Bisphenol A content French law 2012-1442 of 24 Dec 2012	ABS
USA	Residual Acrylonitril (water) - FDA regulation CFR 21 181.32	ABS
UE	Leachable Lead (Pb) and Cadmium (Cd) - UE 1935/2004	GLASS
FR	Leachable Lead (Pb) and Cadmium (Cd) - French arrêté of 07/11/1985	GLASS
FR	Leachable Aluminium (Al), Arsenic (As), Cobalt (Co) - French arrêté of 07/11/1985	GLASS
DE	Leachable Lead (Pb) and Cadmium (Cd) -> Migration value difference + Additional product category vs FRFood, Commodities and Feed Code (Food and Feed Code - LFGB)	GLASS
FI	Leachable Lead (Pb), Cadmium (Cd), Nickel (Ni), Chrome (Cr) -> internal + lip and rim (Finland 268/1992)	GLASS
AT	Leachable Zinc (Zn), Baryum (Ba), Antimony (Sb)BGBI 89/1993 (AUSTRIA)	GLASS
USA	Leachable Lead (Pb) and Cadmium (Cd) -> testing protocol + Migration value difference according to article volume CPG545.450 & 545.400	GLASS
DE	Sensory test - LFGB	ALL
DE	Color Release test - LFGB	ALL
DE	Cadmium and Lead content - LFGB	ALL
ALL	Special attention: this list can be completed and additional lab tests requested according to specific product requirement.	ALL

SPECIAL ATTENTION

- Allegations / use of allegations

Allegations must be accurate, based on established, precise checking methods and checking protocols Ex: ultrawashability function, coloring distance, cap off time...

Supplier Name:

Supplier Contact / Position:

Date:

Signature / Stamp: