PRODUCT STEWARDSHIP POLICY

1. Purpose
The purpose of Product Stewardship Policy is to ensure that our products can be safely used by our stakeholders, and that chemical risks and their impacts are incorporated in decision making relating to our operations, strategy implementation and long term strategic development. The proactive management of safe use of chemicals and the protection of the environment and human health are fundamental pre-requisites for conducting our business. DOSAS strives to protect the environment, human health and safety in all of its business operations, as defined in DOSAS’ Code of Conduct. Product stewardship approach is also contributing to the efficient risk management at DOSAS, as defined in DOSAS Risk Management Policy.

2. Scope
This Policy determines the level of commitment and minimum requirements for product stewardship and chemicals regulatory compliance management within DOSAS. This Policy applies to all DOSAS locations and operations and all DOSAS employees.

3. Definitions
In this Policy the following expressions have the following meanings:

“New Product Development” is the process defining the activities for developing new products from idea to market.

“Product Introduction” covers the activities that are necessary to prepare a new chemical product to be manufactured and sold including the product data collection, evaluation and master data set up.

“Product Stewardship” is the responsible and proactive management of the health, safety and environmental aspects of a product throughout its lifecycle.

“Product Lifecycle Management” means activities related to product introduction, evaluation and modification during the product lifetime and product withdrawal from the product portfolio.

4. Commitment
DOSAS is committed to the following principles:

- To comply with all applicable chemical regulatory requirements in the countries where we either manufacture and/or sell chemicals
- To perform regulatory compliance reviews for all New Product Development projects as well as all Product Introductions
- To assess regulatory compliance, human health, safety as well as environmental protection aspects as part of the Product Lifecycle Management processes
- To proactively identify and manage chemical risks and concerns throughout its operations
- To replace those substances in the portfolio that would pose an unacceptable risk to human health, safety or environment according to the regulatory risk assessment methods applied by regulatory bodies
- To share information with our stakeholders about the health and safety aspects of products and to ensure that our customers can safely use our products
The Key accountabilities and responsibilities are defined in the Product Lifecycle Management processes including the New Product Development process.

5. Consequences of non-compliance

DOSAS employees who violate this Policy will be subject to disciplinary action, up to and including termination of employment.

6. Further information

Any questions regarding this Policy are to be raised with Head of Product Stewardship & Regulatory Affairs.

7. Validity

The version 0 of this Policy has been approved by the Management Board on November 6, 2020.

PRIMARY REFERENCES

- DOSAS Code of Conduct
- DOSAS Supplier’s Code of Conduct
- DOSAS Group HSEQ Policy
- DOSAS Hazard Identification & Assessment of risks and opportunities procedure
- UN Global Compact