	PRODUCT STEWARDSHIP GOVERNANCE					Page 1 of 2
DOCUMENT NUMBER	CLASSIFICATION	DOCUMENT LEVEL	REVISION NUMBER	ISSUE DATE	PREPARED BY	APPROVAL
ST-MG-017	CONTROLLED	POLICY	00	Sep-20	HSEQ	MANAGEMENT

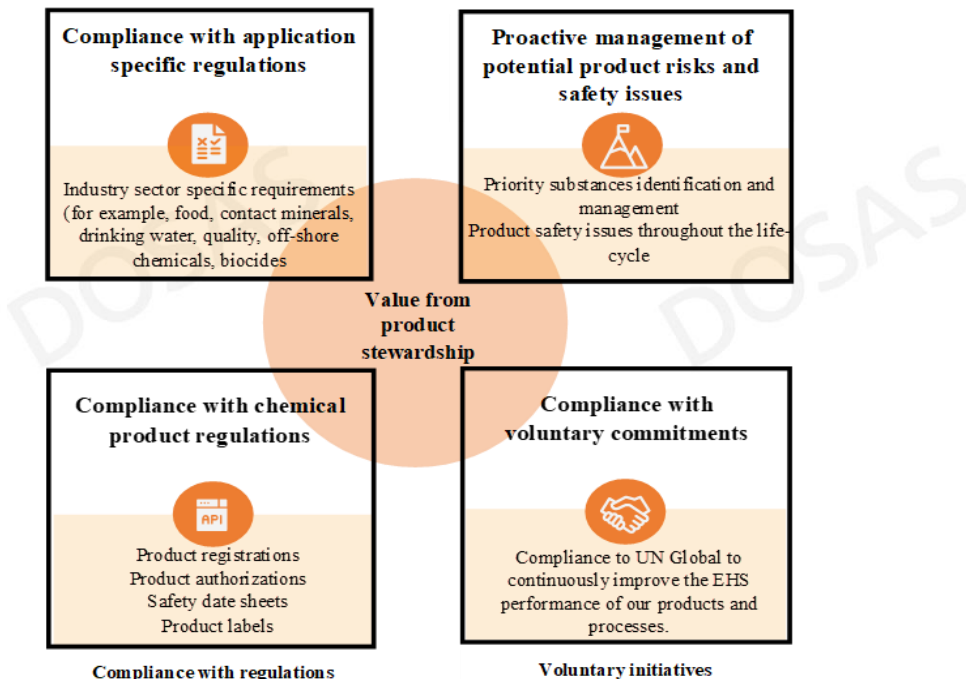
PRIORITY SUBSTANCE MANAGEMENT IN DOSAS


DOSAS' Product Stewardship Policy defines the minimum requirements for our operations 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 business.

DOSAS continuously develops and strengthens the proactive management of the health, safety and environmental aspects of a product throughout its lifecycle. The identification of product portfolio related risks at an early stage and managing those risks along the value chain are important for the long term development of a sustainable products and solutions. Our priority substance management covers the hazardous substances that are defined controversial by different regulatory schemes or considered problematic by our stakeholders. For example, under the EU chemicals law REACH we follow closely the candidate list of substances of Very High Concern (SVHC) which may face a restriction or a permit for use in future. We are looking for safer alternatives before any regulatory decisions are made.

The foundation for priority substance management was laid by Product Stewardship Community which was operational since 2019. From 2020 onwards, the priority substance management process is integrated into operative business processes. The operational work is coordinated by the head of Product Safety and Regulatory Affairs (PSRA). The product line management of the segments are closely involved but also PSRA, EHSQ and R&D. The process schemes cover 1) Identification and 2) Review and management of priority substances. Responsibilities for the key activities of both process schemes and the governance model were approved by the Operational Excellence Board.

Product stewardship management approach:



	PRODUCT STEWARDSHIP GOVERNANCE					Page 2 of 2
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DEFINITIONS

Priority substances are substances that are controversial and/or debated by the stakeholders. For example, there may be concerns about their hazards or exposure—e.g. endocrine disruptors like hormone system interfering substances. Priority substances also include substances with especially harmful or hazardous properties with long-term effects (carcinogenic, mutagenic, toxic for reproduction etc.); and substances within relevant regulatory schemes with the anticipation of stricter regulation in the future (restricted use, prohibition, authorization). The list of priority substances will serve as guidance for product development and product portfolio management to have extra consideration and evaluation on those products that contain these substances to conclude the appropriate risk management activities.

DOSAS Grey List includes identified priority substances, that are listed for example in SVHC candidate, California Proposition 65, SIN, OSPAR, Endocrine disruptor and Conflict mineral lists.

DOSAS Priority Substance List includes those priority substances in DOSAS portfolio from raw materials to final products which are screened against the DOSAS Grey list to represent the major risk for our business. Management plans are prepared for these DOSAS priority substances.

Priority Substance management plans create further awareness within DOSAS about substances that need further risk management focus. They will enable to act proactively to the changing requirements and stakeholder expectations by adjusting our offerings ahead or at par with the competition. Our priority substance management plan aims to define the specific risks associated to each substance, examine options for managing these specific risks, and formulate action plans for the preferred options. These options to mitigate risks may include e.g. substitution, phase-out or limiting exposure.

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