



## Product Stewardship Policy

Policy Number: CORP-POL-00054

Policy Owner: Legal & Compliance, in coordination with Quality, Research & Development, and Supply Chain, Marketing, and Environmental, Health & Safety (EHS)

Contacts: Legal & Compliance ([legal@vybond.com](mailto:legal@vybond.com)), Human Resources

Confidential Reporting: Paycom Ethics Helpline (24/7, anonymous). Vybond strictly prohibits retaliation against anyone who, in good faith, reports a concern, raises a question, or participates in an investigation. This protection is further detailed in Vybond's [Non-Retaliation Policy CORP-POL-00020](#).

### Purpose

Vybond is committed to the responsible management of its products throughout their lifecycle. This Product Stewardship Policy establishes Vybond's framework for ensuring that our products are designed, manufactured, marketed, distributed, and supported in a manner that protects human health, safety, and the environment, while complying with applicable legal and customer requirements.

This Policy complements Vybond's Environmental, Health & Safety (EHS) Vision and Environmental Management System (EMS) and reflects the Company's commitment to regulatory compliance, product integrity, and customer trust.

### Scope

This Policy applies to:

- All Vybond products, including adhesive tapes, coatings, films, and related materials
- All stages of the product lifecycle, including research and development, raw material selection, manufacturing, packaging, labeling, distribution, use, and end-of-life considerations
- All Vybond personnel and functions involved in product development, sourcing, manufacturing, quality, sales, regulatory compliance, and customer support
- Third parties acting on behalf of Vybond where applicable (e.g., suppliers, contract manufacturers)

### Policy Statement

Vybond is committed to:

- Designing and manufacturing products that are safe for their intended use when handled and used in accordance with provided instructions
- Complying with applicable product safety, chemical, environmental, and consumer protection laws and regulations in jurisdictions where Vybond products are manufactured or sold
- Communicating product-related health, safety, and environmental information accurately and transparently
- Proactively managing risks associated with raw materials, chemical constituents, and finished products



- Continuously improving product stewardship practices through review, training, and engagement with customers and suppliers

## **Regulatory Compliance**

Vybond maintains processes to identify and comply with applicable product-related regulations, which may include, as applicable:

- Occupational Safety and Health Administration (OSHA) Hazard Communication requirements
- Globally Harmonized System (GHS) for classification and labeling of chemicals
- U.S. Toxic Substances Control Act (TSCA)
- EU REACH and RoHS requirements
  - California Proposition 65
  - Volatile Organic Compound (VOC) limits and emissions requirements
  - Conflict minerals disclosure and responsible sourcing regulations, where applicable
  - Customer-specific regulatory and sustainability requirements

Compliance obligations are evaluated based on product composition, intended use, and markets served.

## **Product Safety & Chemical Management**

Vybond is committed to responsible chemical management by:

- Evaluating raw materials and formulations for regulatory compliance and product safety
- Maintaining Safety Data Sheets (SDS) where required and making them available to customers and employees
- Implementing change management processes to assess product safety and compliance impacts when formulations, suppliers, or processes change
- Supporting appropriate testing, documentation, and certifications as required by regulation or customer request

## **Responsible Sourcing & Conflict Minerals**

Vybond is committed to responsible sourcing practices and supports efforts to prevent the use of minerals that directly or indirectly finance armed conflict or human rights abuses.

Where applicable, Vybond will:

- Seek to understand and manage supply chain risks related to conflict minerals (such as tin, tantalum, tungsten, and gold)
- Request relevant sourcing information from suppliers, consistent with applicable laws and customer requirements



- Support reasonable customer requests for conflict minerals disclosures or declarations
- Encourage suppliers to adopt responsible sourcing practices aligned with recognized industry standards

Vybond does not intentionally source conflict minerals for use in its products; however, due to the nature of complex supply chains, Vybond relies on information provided by its suppliers. This Policy does not create guarantees regarding the origin of raw materials.

### **Environmental Considerations**

Consistent with Vybond's EHS Policy and EMS, product stewardship includes:

- Considering environmental impacts across the product lifecycle, including material selection, manufacturing, packaging, and disposal
- Supporting customer requests for environmental information where feasible (e.g., VOC content, recycled content, sustainability disclosures)
- Preventing pollution and minimizing environmental impact associated with products and their manufacture

This Policy does not create guarantees regarding environmental performance but establishes Vybond's commitment to responsible product management.

### **Roles & Responsibilities**

#### **Environmental, Health & Safety (EHS)**

- Provide input on environmental, health, and safety risks associated with manufacturing processes
- Support regulatory compliance related to workplace safety and environmental controls
- Coordinate on product-related inquiries only where they intersect with manufacturing safety or environmental impacts

#### **Quality**

- Maintain control of product specifications and documentation integrity
- Ensure that packaging and labels conform to approved artwork
- Support with customer audits and product compliance assessments

#### **Legal & Compliance**

- Monitor applicable laws and regulations impacting product safety and chemical compliance
- Support interpretation of regulatory obligations and customer contractual requirements
- Request and maintain supplier-provided regulatory and sourcing information related to raw materials and components

#### **Marketing**

- Collaborate with Legal & Compliance, Quality, and other internal stakeholders to ensure product-related, labeling, marketing materials and claims are accurate, consistent, and supported by approved information



- Ensure that external communications related to product safety, regulatory compliance, or environmental attributes are reviewed through established internal processes prior to release

### **Research & Development / Engineering**

- Incorporate product safety and compliance considerations into product design and changes

### **Sales & Customer Support**

- Coordinate product safety, regulatory, and sustainability inquiries through established internal channels

### **Customer & Stakeholder Communication**

Vybond will respond to reasonable customer and regulatory inquiries related to product safety, regulatory compliance, and environmental attributes through established internal review processes to ensure accuracy and consistency.

### **Training & Awareness**

Relevant employees will receive appropriate training regarding product stewardship responsibilities, including hazard communication, regulatory awareness, and internal procedures, as determined by role.

### **Related Policies & References**

- Code of Ethics and Business Conduct (CORP-POL-01148)
- Environmental, Health & Safety Vision & Policy
- Quality Management System documents
- Supplier Code of Conduct (CORP-POL-00049)

### **Reporting Concerns**

Concerns related to product safety, chemical compliance, or environmental impacts should be reported through management, EHS, Quality, or Legal & Compliance. Vybond is committed to reviewing reported issues promptly and taking appropriate corrective action.

- Product stewardship practices will be periodically reviewed to support continuous improvement.
- Concerns can be raised confidentially through the [Paycom Hotline 24/7](#).
- Reports may also be directed to Managers, HR, or Legal & Compliance ([legal@vybond.com](mailto:legal@vybond.com)).
- Retaliation for good faith reporting is strictly prohibited (see also Vybond's Non-Retaliation Policy CORP-POL-00020).
- All reports will be investigated promptly and appropriately by HR or Legal. Confidentiality will be preserved as much as possible, while ensuring a complete investigation and fulfilling Vybond's legal responsibilities.



## Disclaimer

This Policy is intended to provide a framework for product stewardship and does not create contractual obligations or warranties regarding product performance or regulatory compliance. Vybond reserves the right to interpret, modify, or amend this Policy as necessary to comply with applicable laws and business requirements.

## Version Control

Date	Version Number	Purpose/Change	Author/Approver
March 1, 2026	1.0	New Policy	Legal & Compliance Manager