BURGESS
PIGMENT, LLC

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September 28, 2026

To Whom It May Concern:

Burgess Pigment, LLC declares that it has read, understood, and is compliant with the following EU Directives / Commission Regulations:

EU 2025/40	**Packaging and packaging waste**
2000/53/EC	**End of Life Vehicle (ELV)**
999/2001	**Rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies, including amendments through 220/2009**
2002/96/EC	**WEEE Directive**
1935/2004	**Materials and articles intended to come into contact with food**
1907/2006	**Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), including amendments through (EU) No 2025/1988**
2023/2006	**Good manufacturing practice for materials and articles intended to come into contact with food**
1272/2008	**The classification, labeling and packaging of substances and mixtures, including amendments through (EU) 2025/1222**
10/2011	**Plastic materials and articles intended to come into contact with food, including amendments and corrections: (EU) 321/2011, (EU) 1282/2011, (EU) 1183/2012, (EU) No 202/2014, (EU) 2016/1416, (EU) 2018/79, (EU) 2018/831, (EU) 2019/37, (EU) 2020/1245 and (EU) 2025/351**
2011/65/EU	**Restriction on Hazardous Substances in Electrical and Electronic Equipment (RoHS), including amendment (EU) 2015/863 *Notes* - No exemptions required for compliance, recast of Directive 2002/95/EC, including amendments through the date of this letter.**

Furthermore, Burgess Pigment, LLC confirms that no product we manufacture or sell is made from elements or compounds designated as Substances of Very High Concern (SVHC, ECHA Candidate List & CoRAP list) or found on the Substitute It Now (SIN) list as published through February 4, 2026.

Our products comply with GADSL, having no prohibited or declarable substances as published including amendments through the date of this letter.
Our products do not contain substances listed in ANNEX XVII of the REACH Regulation, as published including amendments through the date of this letter.
Our products do not contain substances that require reporting under California Prop. 65 or the Toxic Air Contaminant list, including amendments through the date of this letter.
Our products do not contain halogens, halogenated compounds, AZO dyes, aromatic amines, or polycyclic aromatic hydrocarbons (IPA / PAH / PAK).
Our products do not contain Persistent Organic Pollutants (POPs, Dioxins, Furans, PCBs, etc.) as listed by the Stockholm Convention and recast in (EU) 2025/1930, as amended.
Our products do not contain Persistent Bioaccumulative Toxic (PBT) chemicals as listed by the Great Lakes Binational Toxic Strategy (GLBNS): 12 compound groups.
Our products do not contain Persistent Bioaccumulative Toxic (PBT) chemicals listed under TSCA Section 6(h), as published through the date of this letter.
Our products do not contain any compounds, VOCs or gases found on the CEPA 1999 Toxic substances list: Schedule 1 (updated June 26, 2019).
Our products do not contain listed "Dual Use" substances or "Dual Use" additives, Allergens, Plant or Animal materials, Pesticides, or Genetically Modified Organisms (GMOs).
Our products do not contain plastic compounds, microplastics or any plasticizers such as Bisphenol A, B, S & F, or Phenols, or any Phthalate Compounds.
Our products do not contain the compounds commonly referred to as BADGE, BFDGE, or NOGE. Therefore EC 1895/2005 is not applicable.
Our products do not contain Benzenamine, N-phenyl-, Reaction Products with Styrene and 2,4,4-Trimethylpentene (BNST).
Our products do not contain / are not made with natural rubber latex, grain, nut, seed, dairy, animal, insect, seafood, plant, bark, soil components or contaminants.
Our products do not contain / are not made with synthetic polymer microparticles, or substances treated with ionizing radiation or chemical cleaning solutions.
Our products do not contain N-Methyl-2-Pyrrolidone (NMP), Alkylphenol Ethoxylate surfactants (APEO), or Linear Alkylbenzene Sulfonate (LAS).
Our products do not contain Azo compounds such as Azodicarbonamide (ADCA or ADA), semicarbazide, or Cyano / Nitrile group compounds, or NO_2 / NO_x compounds.
Our products do not contain ozone depleting substances or controlled substances described in 40 CFR 82 and (EC) 1005/2009.
Our products do not contain Benzophenone or substituted benzophenones such as Oxybenzone and Dioxybenzone.
Our products do not contain flame retardants such as Polybrominated Diphenyl Ethers (PBDE), Hexabromocyclododecane (HBCDD) or Antimony trioxide.
Our products do not contain plastic polymers such as Polyvinyl Chloride (PVC) or Polyvinylidene Chloride (PVDC), or mono, di, tri (n-octyl)tin type stabilizers.
Our products do not contain Per- and Polyfluoroalkyl Chemicals, including all listed PFAS and PFAC chemicals such as PFOS, PFOA, PFHxS, PFNA & PFDA.
Our products do not contain carcinogenic, mutagenic and reprotoxic (CMR) substances, or known or suspected endocrine disruptors, as published through the date of this letter.
Our products do not contain short-chain or medium-chain chlorinated paraffins (SCCPs and MCCPs), or Mineral Oil, MOSH, MOAH, POSH, PAH substances.
Our surface modified clay products do not contain residual polysiloxane compounds or free silicones.

We affirm that Burgess Pigment products are not intentionally made to nanoscale and are not made from substances intentionally made to nanoscale, as defined in documents published in the United States or Europe. We also affirm our products do not contain Conflict Minerals, Crystalline Silica, Mica, or Asbestos. All minerals are mined in the USA.

Burgess Pigment products are compliant with CONEG, RoHS3, EU Packaging Directives, and the Manufacturing Restricted Substances List (MRSL) Version 3.1 (2025).
We affirm that all Burgess Pigment products do not exceed the following limits with regards to materials or components, nor are any of the following intentionally added:

Lead	**(Pb)**	**< 90 ppm (0.009 %)**	**Cadmium**	**(Cd)**	**< 90 ppm (0.009 %)**
Mercury	**(Hg)**	**< 90 ppm (0.009 %)**	**Hexavalent Chromium**	**(Cr VI)**	**< 90 ppm (0.009 %)**
Polybrominated Biphenyls	**(PBB)**	**< 1000 ppm (0.1 %)**	**Polybrominated Diphenyl Ethers**	**(PBDE)**	**< 1000 ppm (0.1 %)**
Bis(2-ethylhexyl) phthalate	**(DEHP)**	**< 1000 ppm (0.1 %)**	**Butyl benzyl phthalate**	**(BBP)**	**< 1000 ppm (0.1 %)**
Dibutyl phthalate	**(DBP)**	**< 1000 ppm (0.1 %)**	**Diisobutyl phthalate**	**(DIBP)**	**< 1000 ppm (0.1 %)**

Sincerely,

Jeremey Andrews VP
Operations Burgess
Pigment, LLC

Chad Jones
QC Manager Burgess
Pigment, LLC

Erik Orr
EH&S Manager
Burgess Pigment, LLC