

Chemical Requirements for Suppliers

Aalesund Protective Wear AS

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1. Introduction

1.1 Purpose

This document sets out the chemical requirements that all suppliers of Aalesund Protective Wear AS (AAPW) must comply with. The requirements apply to all articles, components and materials supplied to AAPW, including packaging materials.

AAPW bases its chemical-related environmental and health policies on current Norwegian and EU legislation, voluntary schemes and industry best practice. Our requirements reflect an awareness of how chemicals affect human health and the environment, as well as our customers' constantly increasing quality demands.

1.2 Environmental and chemical policy

AAPW continuously works to improve our routines to ensure product quality and safety, thereby reducing the detrimental impact of our products on the environment and human health. We are committed to:

- Systematically reducing the use of hazardous substances in our products and supply chain.
- Complying with all applicable chemical legislation in markets where our products are sold.
- Working proactively towards substitution of substances of concern, even before regulatory restrictions take effect.
- Maintaining membership in the Swedish Chemicals Group (hosted by RISE) for access to up-to-date chemical guidance and industry collaboration.

1.3 Related documents

Document	Classification
Guidelines for Suppliers (incl. Code of Conduct)	Internal document
Minimum Criteria for Suppliers	Internal document
The Chemicals Guidance (Swedish Chemicals Group / RISE)	Reference document
Policy for Responsible Business Conduct	Public

2. Chemical requirements

2.1 The Chemicals Guidance (Swedish Chemicals Group)

AAPW is a member of the Swedish Chemicals Group, a network hosted by RISE (Research Institutes of Sweden). The network provides access to The Chemicals Guidance, a comprehensive reference document that is updated twice a year and covers chemical requirements for textiles, clothing, leather goods, footwear and packaging materials.

By signing this document, the Supplier is required to ensure that no substance listed in The Chemicals Guidance is present in AAPW articles or parts of AAPW articles at a level above the limit specified in the latest version of The Chemicals Guidance.

AAPW will distribute the latest version of The Chemicals Guidance to suppliers twice a year. It is the Supplier's responsibility to ensure that production processes and materials comply with the requirements set out in the latest distributed version.

2.2 REACH Regulation

Regulation (EC) No 1907/2006

The Supplier is required to ensure that AAPW articles comply in all respects with REACH, including:

- Annex XVII – Restricted substances: No substance restricted under Annex XVII shall be present in AAPW articles above the applicable limit.
- Candidate List (SVHC): No substance on the Candidate List of Substances of Very High Concern shall be present in AAPW articles or parts of articles above 0.1% by weight, or above any stricter limit specified in The Chemicals Guidance. The Candidate List is updated regularly and currently contains 253 entries (as of February 2026).
- SCIP Database: The Supplier shall support AAPW in fulfilling its SCIP notification obligations by providing required information about SVHCs in articles.

The Supplier must monitor and comply with the legally binding versions of REACH at all times, including new restrictions as they enter into force.

2.3 PFHxA restriction (REACH entry 79)

Restrictions on undecafluorohexanoic acid (PFHxA), its salts and related substances take effect in the EU/EEA from April 2026 under REACH Annex XVII. These substances have been commonly used in water-repellent textile finishes. The Supplier must ensure compliance with these restrictions from the applicable date.

2.4 PFAS – Per- and polyfluoroalkyl substances

PFAS (per- and polyfluoroalkyl substances) have historically been used in textiles for water and stain repellency. Due to their persistence in the environment and potential health effects, these substances are subject to rapidly increasing regulation:

- France: From 1 January 2026, PFAS are banned in consumer clothing, footwear and waterproofing agents (Law No. 2025-188). Personal protective equipment (PPE) is currently exempt. From 2030, the ban extends to all textiles.
- Denmark: From 1 July 2026, PFAS are banned in clothing and footwear for consumer use. Professional and safety clothing is exempt.
- EU REACH universal restriction: A comprehensive PFAS restriction proposal is under review by ECHA. Final opinions are expected in 2026, with an EU Commission decision likely in 2027.

AAPW expects its suppliers to proactively work towards PFAS-free alternatives where technically feasible. Where PFAS are still used, the Supplier must inform AAPW and provide documentation of the specific substances, their function and concentration levels.

Note on PPE: Products classified as Personal Protective Equipment under EU Regulation 2016/425 are currently exempt from several national PFAS bans. However, AAPW encourages suppliers to develop PFAS-free alternatives also for PPE products where this does not compromise required safety performance.

2.5 POPs Regulation

Regulation (EU) 2019/1021

The POPs Regulation implements the Stockholm Convention on Persistent Organic Pollutants in European law and includes restrictions on certain substances in articles. The Supplier shall ensure that AAPW articles comply with the POPs Regulation at all times, including restrictions on PFOS, PFOA and related substances.

2.6 Biocidal Product Regulation (BPR)

Regulation (EU) 528/2012

Biocides used in AAPW articles or parts of articles shall meet the requirements of the BPR. If an article is treated with or intentionally incorporates biocidal products, the Supplier is obliged to:

- Inform AAPW about the biocidal treatment, including the active substance used.
- Ensure that the article is labelled in accordance with BPR requirements.
- Provide relevant documentation upon request.

3. Special requirements for Personal Protective Equipment

AAPW supplies a significant range of products classified as Personal Protective Equipment (PPE) under EU Regulation 2016/425. PPE products are subject to specific requirements:

- PPE must comply with all applicable EU legislation and relevant harmonised standards (EN ISO).
- PPE may in some cases be exempt from certain REACH restrictions. These exemptions are described in The Chemicals Guidance. The Supplier must verify applicability on a case-by-case basis.
- Where PPE-specific chemical exemptions apply, the Supplier must still ensure that substances used do not pose unacceptable risks to the wearer.
- The Supplier shall keep AAPW informed about any substances used in PPE products that are subject to ongoing regulatory developments (e.g. PFAS in protective clothing).

4. Overview of applicable regulations

The following table provides an overview of key EU regulations relevant to the chemical content of AAPW products. This is not an exhaustive list, and the Supplier is responsible for complying with all applicable legislation.

Regulation	Scope and relevance
REACH (EC 1907/2006)	Registration, Evaluation, Authorisation and Restriction of Chemicals. Annex XVII restrictions, SVHC Candidate List and SCIP notifications.
POPs (EU 2019/1021)	Persistent Organic Pollutants. Restrictions on substances including PFOS, PFOA and related compounds in articles.
BPR (EU 528/2012)	Biocidal Product Regulation. Rules for articles treated with biocidal products, including labelling requirements.
PPE (EU 2016/425)	Personal Protective Equipment Regulation. Basic safety requirements for PPE, including chemical safety rules.
GPSD / General Product Safety Regulation	Requires that only safe products are placed on the market. Businesses must inform consumers of risks and ensure traceability.
PPWR (EU 2025/40)	Packaging and Packaging Waste Regulation. Includes PFAS limits for food-contact packaging and requirements on packaging design and recyclability.
Packaging Directive (94/62/EC)	Requirements on hazardous substances in packaging materials and components. Packaging must also comply with REACH.
ESPR (Ecodesign for Sustainable Products)	Framework for sustainable product design, including Digital Product Passports. Expected delegated acts for textiles in 2026–2027.
Waste Framework Directive (2008/98/EC)	SCIP Database notification obligations for articles containing SVHCs above 0.1% by weight.

5. Testing and verification

5.1 Supplier responsibility

The maximum limits specified in The Chemicals Guidance shall never be exceeded in any product supplied to AAPW. It is the Supplier's responsibility to ensure that all chemical requirements are met at all times.

The Supplier must have adequate procedures in place for chemical management, including incoming material controls, restricted substance testing, and documentation of chemical inputs throughout the production process.

5.2 Testing procedures

AAPW will request test reports from suppliers on a regular basis. Testing may include both routine checks and targeted testing based on risk assessments. AAPW also reserves the right to:

- Perform inspections and tests on any ordered products, at any time and at any stage of production.
- Require unannounced testing of articles.
- Commission independent third-party testing at accredited laboratories.

5.3 Cost allocation

The Supplier is responsible for all test costs when tests are requested as part of routine compliance verification. If AAPW initiates inspections that reveal breaches of these requirements, the Supplier will bear the cost. If inspections initiated by AAPW show no breaches, AAPW will bear the cost of those tests.

5.4 Failed test results and corrective action

If a test report shows non-compliance with these chemical requirements:

- A decision on how to handle the affected order will be made by AAPW.
- An action plan with corrective measures and timelines shall be established in cooperation with the Supplier.
- Two follow-up tests on subsequent orders will be included in the action plan, at the Supplier's expense.
- Repeated non-compliance may result in suspension of orders or termination of the business relationship.

6. Violation and remedies

In case of violation of these chemical requirements, AAPW reserves the right to:

- Be compensated for financial losses and expenses incurred.
- Cancel the order, claim compensation, or take any other action in accordance with the General Agreement.
- Suspend further orders pending corrective action by the Supplier.

7. Contact

For questions regarding chemical requirements, testing or compliance, please contact:

Sandra Nordheim Eikenes, COO

Aalesund Protective Wear AS

Nørvevika 62, 6008 Ålesund, Norway

E-mail: sandra@aapw.no

Change log

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