

## Regulatory Compliance Certificate

### BOPP Films

**SUPEX, SUPLAIN, SUPMET, SUPWHITE, SUPEARL, SUPERSTOCK, SUPERSEAL,  
SUPERECO, BOPMAR**

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#### Food-contact EU

We confirm that the production of our BOPP films that Süper Film supplies to the customer is made only from the materials sanctioned by EC Regulations for food contact packaging.

All components are in conformance with **COMMISSION REGULATION (EU) No 10/2011 of 14 January 2011** including its amendments (EU) No. 1282/2011 of November 28, 2011, (EU) No. 1183/2012 of November 30, 2012, (EU) No. 202/2014 of 3 March 2014, (EU) No. 2015/174 of 5 February 2015, (EU) No. 2016/1416 of 24 August 2016, (EU) No. 2017/752 of 28 April 2017, (EU) No. 2018/79 of 18 January 2018, (EU) No. 2018/213 of 12 February 2018, (EU) No. 2018/831 of 05 June 2018 and **(EU) No. 2019/37 of 10 January 2019** on plastic materials and articles intended to come into contact with food or national legislations as listed.

Our BOPP films also meets the relevant requirements of Regulation (EC) 1935/2004 (Article 3, 11(5), 15 and 17 and other amendments) on materials and articles intended to come into contact with food.

BOPP films are produced only from virgin resins and do not contain post-consumer recycled components, and no obligation exists under the 282/2008/EC.

**Italy:** Decreto Ministeriale 21/03/1973 and subsequent amendments including D.M. of 23/4/09, N° 144

**Spain:** Official State Bulletin published the Royal Decree 1025/2015 of 13 November (amending a previous one) on the conditions to be met by recycled raw materials based on polymeric materials for their use in packaging and other articles in contact with food.

**Germany:** Bedarfsgegenständeverordnung 23/12/1997 und Änderungen vom 21/12/2000, 07/04/2003, 13/07/2005, 30/11/2006, 20/12/2006, 08/08/2007, 11/02/2008, 30/04/2008, 16/06/2008, 23/09/2009 sowie BfR Empfehlungen A - VII, Polypropylene, Stand. 01/06/2010

**Switzerland:** Swiss Regulation SR 817.023.21, Swiss Directive of EDI (The Federal Department of Internal Affairs) on materials and articles in contact with food. Valid from 23 November 2005.

**China:** Food Safety Law – April 25, 2015 (implemented on October 1, 2015), National rules on food safety – standard GB including its amendments; GB 4806.1 – 2016, GB 31603 – 2015, GB 9685 – 2016, GB 4806.6 – 2016, GB 4806.7 – 2016, GB 31604.1 – 2015, GB 4806.10 – 2016.

**Japan:** Japan Hygienic Olefin and Styrene Plastics Association (JHOSPA), Japan Hygienic PVC Association (JHPA).

**France:** Decree 2007-766 of 10th May 2007 for the application of the French Consumer Code regarding materials and articles intended to come into contact with food (repealing decree 92-631 of 8th July 1992). Decree 2008-1469 of 30th December 2008 amending decree 2007-766 of 10th May 2007.

**Whereas Super Film Amb. San. And Tic. A.Ş. supplies to its customers the adequate information to allow them to fulfil their own responsibilities, the converters do have to check and confirm that the final article meets both the technical and regulatory requirements of the application.**

### **Food Contact US**

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We confirm that the production of our BOPP films that Super Film supplies to the customer is made only from the materials sanctioned by FDA.

All components comply with the US Food, Drug and Cosmetic Act of 1958 and applicable indirect food additive regulations of the United States of America as set out in the Code of Federal Regulations of the US Food and Drug Administration (FDA), under title 21 with sections as;

- 21 CFR 177.1520 (a)(1),(b) and (c)1.1
- 174.5
- 176.170(c), table1.
- 178.3130
- 178.3860
- 178.2010
- 182.1711
- 184.1033
- 184.1324

### **Migration Test - EC**

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We confirm that the films complies with the migration testing of the regulation 82/711/ECC and its amendments.

In accordance with Commission Regulation (EU) 2016/1416, the overall migration shall not exceed 10 mg/dm<sup>2</sup> from plastic materials and articles, with the exception for plastic materials and articles intended to contact infant or child food (60mg/kg).

Our films are tested under the conditions 4 hours at 100°C (OM6) and 2 hours at 175°C in the three standard food simulants; olive oil (simulant D2), acetic acid solution (simulant B) and ethyl alcohol solution (simulant A), show that the overall migration limit of 60 mg/kg or 10 mg/dm<sup>2</sup> food is not exceeded in accordance with European Standards ENV- 1186:2002.

Compliance with the overall and specific migration limits as described above must be measured from the final packaging intended to come into contact with foodstuff by using real food or appropriate food simulants at the intended and foreseeable conditions of use as specified in Annex III of Commission Regulation (EU) 2016/1416. It is the responsibility of the converter or food packer to verify that the final packaging complies with the overall and specific migration limits as set out by the applicable legislation.

### Specific Migration

We would like to confirm that our BOPP films contain some SML substances according to EU commission 2016/1416. SML information is given for special for film code as confidential document. Please contact with sales department.

We confirm that we got all SML information of our raw materials from our suppliers and according to our worst case calculation for our formulations, we do not exceed specific migration limits.

Maximum usage quantity is given by raw material suppliers and the films are formulated accordingly to not to exceed specific migration limits.

Total packaging structure are beyond the control of SUPER FILM and are a part of the responsibility of the user of our product.

### Dual use substances (Food additives)

We would like to also inform you that our films which are produced in SÜPER FİLM, can contain some dual use additives according to EU 1333/2008 (and its amendments) regulation. Please contact with sales department and request for dual use information.

### Heavy metals: RoHS, WEEE, Packaging Waste 94/62/EC, CONEG

We confirm that the BOPP films comply with the relevant requirements of the following Directives or Regulations:

- 2003/11/EC as amended
- 2011/65/EU (RoHS) as amended
- 2002/96/EC (WEEE) as amended
- 2000/53/EC (EoL) as amended
- Regulation (EC) 1907/2006, annex XVII, as amended in Regulation (EC) 1272/2008 (CLP), repealing
- 76/769/EEC, as amended
- 94/62/EC (Packaging Waste Directive) as amended
- USA CONEG Regulation
- France: Décret n°2007-1467 du 12 octobre 2007 and Code de l'environnement, section 5-Emballages, sub-section 1, Articles R 543-42 to R 543-52

We confirm that the films meet above mentioned legislations requirements of not containing more than 100 ppm of heavy metals.

## Absence of substances and chemicals

In the BOPP films which are produced by SÜPER FİLM AMB. SAN. VE TİC. A.Ş. that we supply you, we can say that they are not formulated with below mentioned substances, which means that we do not intentionally use it as a raw material. And this is also declared and certified by our raw material suppliers. Therefore we do not expect they are presence. However, products have not been tested for these chemical materials.

- Allergens
- Acrylamide (acrylate/acrylamide copolymer (Cas n° 25085-02-3))
- Active and intelligent materials and articles (Regulation 450/2009/EC of 29th May 2009)
- Any material included in the SIN (Substitute It Now) list
- Acrylonitrile
- Animal derived substances which may cause Transmissible Spongiform Encephalopathies (TSE) or Bovine Spongiform Encephalopathy (BSE)
- Benzo [def]chrysene (Benzo[a]pyrene)
- 1,7,7-trimethyl-3- (phenylmethylene)byclo[2.2.1.]heptan-2- one(3-benzylidenecamphor)
- 2-2'-dimethoxy-2-phenylacetophenon
- (-+)-1,7,7-trimethyl-3-[(4- methylphenyl)methylene]bicyclo[2.2.1]he ptanes-2-one(4-methylbenzylidene camphor)
- Dicyclohexyl phthalate (DCHP)
- Isocyanates
- Antraquinone
- Aromatic amines
- Asbestos
- Azodicarbonamide or semi-carbazide compounds
- Benzophenone, hydroxybenzophenone and 4-methyl benzophenone
- Benzene
- Benzonitrile
- Biocides / Biocidal products
- Bisphenol-A (BPA), Bisphenol-S (BPS) and Bisphenol-F (BPF)
- Brominated flame retardants
- Carbon black
- CMR compounds
- Chlorophenols
- Chlorofluorocarbons (CFC), hydrochlorofluorocarbons (HCFC), hydrofluorocarbons (HFC)
- Conflict minerals:
  - Columbite-tantalite (Coltan, Niobium, Tantalum)
  - Cassiterite (Tin)
  - Wolframite (Tungston)
  - Gold
- Decabromodiphenylether (decaBDE)
- DEAB
- DEHP
- DINP
- 2-Ethylhexanoic Acid (2-EHA)
- Di(ethylhexyl) adipate (DEHA) and di(ethylhexyl) maleate (DEHM)
- Dimethyl Fumarate (DMF)
- Dioxins and furans
- Endocrine Disruptors listed in the Japanese authority list "Strategic Programs on Environmental
- Endocrine Disruptors '98 (SPEED '98) - Table-3: Chemicals Suspected of Having Endocrine Disrupting Effects"
- Epoxy derivatives:
  - BADGE [2,2-bis(4-hydroxyphenyl)propane bis(2,3-epoxypropyl) ether],
  - BFDGE [bis(hydroxyphenyl)methane bis(2,3-epoxypropyl) ether],
  - NOGE [novolac glycidyl ether]

as defined in Directive 2002/16/EC amended by 2004/13/EC, repealed by the Regulation 1895/2005/EC

- Epoxidised Soya Bean Oil (ESBO)
- Ethylenimine
- California Proposition 65 List of Chemicals
- 1,7,7-trimethyl-3-(phenylmethylene)bicyclo[2.2.1]heptan-2-one
- 2,2-bis(4'-hydroxyphenyl)-4-methylpentane
- Benzo[k]fluoranthene
- Fluoranthene
- Phenanthrene
- Pyrene
- Pentachlorophenol
- Melamine
- Formaldehyde (formol)
- Hydraquinone
- Isopropyltioxanthone (ITX)
- Lactone
- Latexes
- Melamine and cyanuric acid
- Mercapto mix
- Microplastics
- N-ethyl-o,p-toluolsulfonamide (NETSA) (CAS nb 1077-66-1)
- N-ethyl-p-toluenesulphonamide (NE-PTSA) (CAS nb 80-39-7)
- Nanoparticles
- Nonylphenol and its derivatives
- Octamethylcyclotetrasiloxane
- Decamethylcyclopentasiloxane
- Dodecamethylcyclohexasiloxane
- Lead
- Disodium octaborate
- Benzo[ghi]perylene
- Terphenyl hydrogenated
- Ethylenediamine (EDA)
- Benzene-1,2,4-tricarboxylic acid 1,2 anhydride (trimellitic anhydride) (TMA)
- Dicyclohexyl phthalate (DCHP)
- o-Phenylphenol and its salts (sodium, potassium and MEA o-Phenylphenate)
- Organotin compounds as tributyl-tin (TBT), dibutyl-tin (DBT), monobutyl-tin (MBT)
- Ortho-phthalates
- Polyacrylonitrile (PAN)
- Polyethylene Terephthalate (PET)
- Polystyrene (PS)
- Pentabromodiphenyl ether, octabromodiphenyl ether
- Pentachlorophenol
- Perchloric acid, perchlorate
- Perfluorinated tenside (PFT), Perfluorooctanoic acid (PFOA) & Perfluorooctane sulfonate (PFOS) listed in Directive 2006/122/EC
- Pigment colorants based on antimony
- Poly(aromatic hydrocarbons) according to US Environmental Protection Agency Method 610 (EPA 610)
- Polybrominated biphenyls (PBBs), polybrominated diphenyl ethers (PBDEs), polybrominated terphenyls (PBTs)
- Polychlorinated biphenyls (PCBs), polychlorinated terphenyls (PCTs), polychlorinated naphthalenes (PCNs)
- Polycyclic Aromatic Hydrocarbons (PAH)
- Polyethylene Glycol (PEG)
- Recycled products as defined by Regulation (EC) 282/2008
- Rhodamine based pigments
- Short chained chlorinated paraffins
- Silicone
- Styrene

- Tert-butyl-4-hydroxyanisole (BHA) and 2,6-di-tert-butyl-p-cresol (BHT)
- Thiuram mix
- Titanium Acetyl Acetone (TAA)
- Triclosan (2,4,4'-trichloro-2'-hydroxydiphenyl ether) (CAS 3380-34-5)
- Vinyl chloride monomer (VCM) and its polymers or copolymers (PVC, PVDC, ...)
- Phthalates and its derivatives (Dicyclohexyl Phthalate (DCHP), DIBP (Di-isobutyl phthalate), DEHP (Bis(2-ethylhexyl) phthalate), DBP (Di-butyl phthalate), BBP (Butyl-benzyl phthalate), DIDP (Di-isodecyl phthalate), DINP (Di-isononyl phthalate), DIPP (Di-isopropyl phthalate), DNPP (Di-n-pentyl phthalate), DMEP (Di-methoxyethyl phthalate, n-pentyl-isopentyl phthalate), DNOP (Di-n-octyl phthalate) etc. Diarsenic trioxide (HBCDD)
- Diarsenic pentaoxide
- Lead chromate
- Lead sulfochromate yellow (CI Pigment Yellow 34)
- Lead chromate molybdate sulphate red (CI Pigment Red 104)
- Tris(2-chloroethyl)phosphate (TCEP)
- 2,4-dinitrotoluene (2,4-DNT)
- MOSH (Mineral Oil Saturated Hydrocarbon)
- MOAH (Mineral Oil Aromatic Hydrocarbon)
- di-n-octyltin thiobenzoate 2-ethylhexyl mercaptoacetate
- benzoic acid, methyl ester
- benzoic acid, ethyl ester
- 4-hydroxybenzoic acid, propyl ester
- 4-hydroxybenzoic acid, methyl ester
- 4-hydroxybenzoic acid, ethyl ester
- benzoic acid, butyl ester
- benzoic acid, propyl ester
- 4-hydroxybenzoic acid, isopropyl ester
- 3,5-di-tert-butyl-4-hydroxybenzoic acid, 2,4-di-tert-butylphenyl ester
- 3,5-di-tert-butyl-4-hydroxybenzoic acid, hexadecyl ester
- diantimony trioxide (CAS 1309-64-4)
- Tris(nonylphenyl)phosphite (CAS 26523-78-4)
- Substances listed in:
  - California Proposition 65 State regulation as amended
  - GADSL, "Global Automotive Declarable Substance List", as amended
  - IKEA Specification, IOS-MAT-0010, chapter 3 & 6, as amended
  - IKEA Specification, IOS-MAT-0054, as amended

This certificate will be updated when appropriate. Therefore, it is recommended to contact with sales represents at least once a year for these subjects. It is the responsibility of the customer to check the suitability of the finished article for the intended application.

### Recycling

We also declare that our films can be recycled; in most cases, mechanical recycling can be performed.

### Contact with which food types

Although the above-mentioned products are intended for general food use (i.e. intended for food contact with foodstuffs of all types) it is the responsibility of the user to verify its suitability for his own intended food application.



## ***NANO Materials***

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This letter confirms that all BOPP films which are produced by Super Film are free of any NANO MATERIALS. We can say that they are not formulated with these substances, which means that we do not intentionally use them as raw material. Therefore, we do not expect their presence.

This concerns only the composition of our films produced by us and does not guarantee the compliance of final articles made by using our films.

## ***Notice: For metalized BOPP film***

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We also remind that metalized films are intended to be used with the non-metallized side in contact with food and the user must verify that the films are suitable for the end use and for the products to be packed in.

## ***GMP / Food contact***

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The production and distribution processes of BOPP films have been submitted to a systematic review in regards to Good Manufacturing Practices as defined by the framework Regulation (EC) 1935/2004 and the "GMP" Regulation (EC) 2023/2006 as amended. As a result of this review, Süper Film Amb. San. Ve Tic. A.Ş. can state that the production and distribution processes of this product are compliant with the here-above mentioned Regulations.

## ***REACH / SVHC***

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Süper Film is committed to fully respect REACH legislation and will only use fully REACH compliant raw materials.

We are aware of the new European Community Regulation (EC 1907/2006) titled REACH (Registration, Evaluation, Authorization and Restriction of Chemical substances) which entered into force on 1st June 2007.

According to the definition given in Article 3 number 3 of Regulation (EC) No 1907/2006 (REACH) and the Technical Guidance Document on requirements for substances in articles, packaging films are regarded as articles, since their form or surface determines their function to a greater degree than does their chemical composition. Articles don't require registration under REACH.

We also declare that our films contain no substances of very high concern (SVHC) list published at ECHA website up-dated 15/01/2019 are present above 0.1% by weight in products which are produced by SÜPER FİLM AMBALAJ SANAYİ VE TİCARET A.Ş.

Notwithstanding the fact that the substances referred to in this declaration have not been intentionally added during the production process of the Süper Film products, the absence of such substances has not been verified by analysis or tests and is therefore declared to the best of our knowledge and based on the information available to us from our raw material suppliers. It can therefore not be excluded that trace levels of these substances may be unintentionally present (amongst others because they may be ubiquitous in the environment) or may result from the specific characteristics of the raw materials or the manufacturing process and are therefore not picked up by our quality control.

This declaration does not warrant any specific properties and does not relieve processor from carrying out its own in-house tests and inspections amongst others to determine their suitability for a particular purpose.



Our guarantee is not cover any subsequent modification of the composition of the products, whatever that modification may be, any usage which might produce a denaturalized material, inappropriate use of material or objects.

### ***Phthalates***

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It is well known that phthalates are used as minor component of the catalytic systems used for the production of polypropylene resins. Our raw material suppliers also uses pre-catalysts containing phthalates for the production of most of its polypropylene grades. These phthalates have been introduced in the candidate list in 2009/2010 and now appear in the Annex XIV of REACH. This situation has retained our and our raw materials suppliers attention since the beginning of the inclusion of these phthalates in the authorisation process. We have thus engaged discussions with all raw material suppliers and got the assurance that the use of the catalysts containing phthalates will not be negatively impacted by the approaching sunset date of the latter. This means that our raw materials supplier will be able to continue to use them for the production of their current polypropylene products, without any disruption and any change in their composition until and after the sunset date of the phthalates involved (21 February 2015).

Our raw material suppliers confirmed that they have also gathered analytical evidence that the phthalate used in the catalytic system undergoes a complete chemical transformation during the polymerisation stage and is no longer present nor detectable as such in the final polypropylene with a detection limit of 1 ppm.

We also confirm that all our raw materials manufactured from catalytic systems containing phthalate meet the relevant requirements of Commission Regulations EC 1907/2006, EU 2016/1416 and those of Article 3 of Regulation EC 1935/2004.

In conclusion, we do not expect the our films do not exceed the regulations limits.

### ***GMO***

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Among the large variety of polymer additives that we are using, only a few of them may be genetically modified. We would like to comment on the relevance of gene modification techniques to plastic materials. The most significant fact is that the starting substances or additives possibly deriving from genetically modified organisms based materials are manufactured through multi-step conversion and/or purification processes, involving aggressive conditions like high temperature and pressure as well as action of chemically reactive substances. The final plastic materials themselves are produced under high temperature conditions and are further submitted during conversion processes (extrusion, moulding) to high temperature for a significant period of time.

On the basis of current scientific knowledge, it can be stated that no DNA and no proteins from a given organism (genetically modified or not) can resist to such a series of treatments. Therefore, their presence in our polymers and in plastic articles manufactured from them is unexpected.

In conclusion, we confirm that the above grade is safe to be manufactured, processed and used, even if it is manufactured from starting substances or contain additives which may be of genetically modified organism's origin.

### ***Allergen Statement***

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The food ingredients listed in Annex II of Regulation (EU) No 1169/2011, are not used in the manufacture of or formulation of this product. However, this product has not been tested for these substances.

All raw materials used in the manufacture of our films are free from below indicated substances and this is also declared and certificate by our raw material supplier.



1. Cereals containing gluten (i.e. wheat, rye, barley, oats, spelt, kamut or their hybridized strains) and products thereof, except:
  - (a) Wheat-based glucose syrups including dextrose (1)
  - (b) Wheat-based maltodextrins (1)
  - (c) Glucose syrups based on barley
  - (d) Cereals used for making distillates or ethyl alcohol of agricultural origin for spirit drinks and other alcoholic beverages
2. Crustaceans and products thereof
3. Eggs and products thereof
4. Fish and products thereof, except:
  - (a) Fish gelatine used as carrier for vitamin or carotenoid preparations
  - (b) Fish gelatin or isinglass used as fining agent in beer and wine
5. Peanuts and products thereof
6. Soybeans and products thereof, except:
  - (a) Fully refined soybean oil and fat (1)
  - (b) Natural mixed tocopherol (E306), natural D-alpha tocopherol, natural D-alpha tocopherol acetate, natural D-alpha tocopherol succinate from soybean sources
  - (c) Vegetable oils derived phytosterols and phytosterol esters from soybean sources
  - (d) Plant stanol ester produces from vegetable oil sterols from soybean sources
7. Milk and products thereof (including lactose), except:
  - (a) Whey used for making distillates or ethyl alcohol of agricultural origin for spirit drinks and other alcoholic beverages
  - (b) Lactitol
8. Nuts, i.e. almonds (*Amygdalus communis* L.), hazelnuts (*Corylus avellana*), walnuts (*Juglas regia*), cashews (*Anacardium occidentale*), pecan nuts (*Carya illinoensis* (Wangenh.K. Koch), Brazil nuts (*Bertholletia excelsa*), pistachio nuts (*Pistacia vera*) macadamia nuts and Queensland nuts (*Macadamia ternifolia*), and products thereof, except:
  - (a) Nuts used for making distillates or ethyl alcohol of agricultural origin for spirits drinks and other alcoholic beverages
9. Celery and products thereof
10. Mustard and products thereof
11. Sesame seeds and products thereof
12. Sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/litre expressed as SO<sub>2</sub>
13. Lupin and products thereof
14. Molluscs and products thereof

### ***Statement of Islamic Law (HALAL)***

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- *Pig, lard or dog*
- *Blood*
- *Carnivorous animals (excluding fish).*
- *Birds with talons or feed by snatching tearing*
- *Reptiles & insects*
- *Marine animals except fish*
- *Animals that live on land & water*
- *Animals that have died by any means other than according to Islamic Law.*
- *Animals generally considered repulsive*
- *The bodies of animals permitted under Islamic Law but not slaughtered according to Islamic Law.*
- *Wine, ethyl alcohol or spirits which remain in their original chemical form*
- *Any product or by-product derived from one or more of the above.*

We can say that among the large variety of polymer additives that we are using in our BOPP films, only a few of them may be formulated with substances of animal origin. Our suppliers claim that the processing of such animal-derived substances is made under rigorous conditions, considered unlikely to be infectious irrespective of geographical origin and the nature of the tissues from which they are derived. Our suppliers also claimed that the raw materials that they use and the finished products they sell comply with the existing legislations.

Concerning the absence of wine, ethyl alcohol or spirits in all BOPP films, we can say that they are not formulated with this substance, which means that we do not intentionally use it as raw material. Therefore, we do not expect its presence. This concerns only the composition of BOPP films produced by us and does not guarantee the compliance of final articles made by using our BOPP films.

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**Disclaimer:** This declaration has been prepared and issued on the basis of information provided by our raw material suppliers, of currently applicable laws and regulations and to the best of our knowledge, the information contained herein is accurate and reliable as of the date of publication. SÜPER FİLM makes no warranties which extend beyond the description contained herein. Nothing herein shall constitute any warranty of merchantability or fitness for a particular purpose. It is the customer's responsibility to inspect and test our products in order to satisfy itself as to the suitability of the products for the customer's particular purpose. The customer is responsible for the appropriate, safe and legal use, processing and handling of our products.

No liability can be accepted in respect of the use of SÜPER FİLM products in conjunction with other materials. The information contained herein relates exclusively to our products when not used in conjunction with any third party materials.

Please feel free to contact us if you have any question.

**SUPER FILM - Regulatory Affairs**