

**Calumet REACH Policy Statement**

Effective: January 1<sup>st</sup>, 2025

At Calumet, we are committed to maintaining compliance with global chemical regulations and to supporting our customers in navigating their responsibilities under regional frameworks such as REACH.

In accordance with Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), Calumet has appointed an Only Representative (OR) to fulfill registration obligations for certain substances that we manufacture or import into the European Union (EU). This appointment supports Calumet's ability to maintain active EU REACH registrations and ensure compliance for select materials shipped into the EU.

For the United Kingdom (UK), Calumet has grandfathered eligible substances under UK REACH. However, full registration decisions are still under evaluation, and substance-specific coverage has not yet been finalized. Customers importing into the UK, including downstream users, are encouraged to consult with our Regulatory team to confirm the current UK REACH compliance status of their materials.

Calumet operates through two main commercial divisions:

- **Specialty Products and Services (SPS)** – includes base oils, process oils, and specialty chemicals
- **Performance Brands** – includes both consumer and industrial formulations

**SPS Division - REACH Coverage for Direct Shipments**

For Calumet substances shipped directly into the EU under our SPS division, REACH registration is automatically covered under Calumet's EU registration portfolio, provided the product is a Calumet-registered substance. However, it remains the responsibility of the EU importer or downstream user to verify whether the specific substances they are using are covered under Calumet's registration.

For shipments into the UK, Calumet has initiated grandfathering under UK REACH for eligible substances but has not yet completed full registration. UK importers and downstream users are advised to confirm coverage status with our Regulatory team prior to placing materials on the UK market.

**Performance Brands Division – Mixtures and Supplier-Based Coverage**

Calumet does not provide blanket REACH coverage for all substances in our Performance Brands products. These materials are typically mixtures and may include components sourced from third-party suppliers. Where required by volume thresholds, Calumet may obtain coverage for certain components. However, importers or downstream users are ultimately responsible for ensuring REACH compliance for the substances they are placing on the EU or UK markets.

**Other Jurisdictions**

Calumet also holds pre-registrations under Korea-REACH and Turkey-REACH (KKDIK). As with EU REACH and UK REACH, inquiries regarding coverage in these jurisdictions should be directed to our Regulatory team for evaluation.

**Contact**

For all REACH-related inquiries—including confirmation of substance coverage, indirect shipment requests, or jurisdiction-specific questions—please contact us at [reach@clmt.com](mailto:reach@clmt.com).

Sincerely,

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