



“VIBRAM RESTRICTED SUBSTANCES POLICY”

Company VIBRAM S.P.A., of Via C. Colombo, n. 5, - 21041 Albizzate (VA) - Italy, hereby

states and guarantees

- its products are manufactured, supplied and shipped strictly abiding by EU Regulation and domestic law;
- its products are properly manufactured with specific qualities, technical and commercial characteristics requested by the governing EU Regulation and domestic law abiding by health and environmental law, consumers and shoes customers protection law providing restrictions related to introducing into the market or using restricted substances and specifically related to:
 - a) EU Directive 455/2009/EC European Parliament and Council of the European parliament and of the council of 6 May 2009 amending Council Directive 76/769/EEC as regards restrictions on the marketing and use of any restricted substances;
 - b) EU Directive 2009/563/EC, as amended, related to the achievement of goals and standards about ecological quality of shoes;
 - c) Article 33 of REACH further to the publication of the candidate list according to Article 59 of REACH on 28/10/2008;
 - d) the proper enforcement of rules, technical and scientific principles to guarantee the complete observance of health integrity, health care, consumer and product safety policy, and in general, the environment and population health protection
 - e) PROPOSITION 65, the Safe Drinking Water and Toxic Enforcement Act of 1986.

In particular, Vibram S.p.A. verifies and guarantees that its own products (in whole parts) do not contain (exceeding the quantity provided by EU regulation and domestic law) none of the substances listed in the enclosed “Annex A” that is a fundamental part of this declaration

Regarding REACH, Vibram supplies “articles” and REACH applies, for the registration of substances in articles (e.g. manufactured goods such as cars, textiles, electronic chips), a special regime.

REACH requirements for articles are referred to "all substances that are intended to be released from articles during normal and reasonably foreseeable conditions of use" and Vibram supplies products that “are not intended to release substances during normal conditions of use”.

Regarding PROPOSITION 65 Vibram carefully reviews California’s Proposition 65 updated list and develops an appropriate compliance program.

However some products sold under Vibram brand contain chemicals known to the state of California to cause cancer, birth defects or other reproductive harm.

Albizzate (VA)

VIBRAM S.p.A.



Annexe A - Product Restricted Substance List

Substance		Limit
Heavy metals (Extractable)		see below (^Δ)
Heavy Metals (total content)	Mercury	< 1ppm
	Lead	< 90 ppm
	Cadmium	< 50ppm
	Barium	Data Collecting
	Selenium	Data Collecting
	Stannum/Tin	Data Collecting
Dimethyl fumarate (DMFU)		n.d. (*)
Chlorinated phenols (PCP, TeCP)		< 0.5 ppm
Chlorinated Paraffins (C10-C13)		n.d.
Formaldehyde		< 20 ppm
PVC		< n.d.
Alkylphenols and their ethoxylates (OP and OPEOs, NP and NPEOs)		AP < 100 ppm APEO < 100 ppm
Organotin compound (stannic) (DBT, MBT, DOT, TBT, TPHT)		TBT / TPhT: 0.5 mg/kg DBT / MBT: 1 mg/kg DOT: 1 mg/kg
PFOS (perfluorooctane sulfonates)		< 1µg/m ²
Azo – Amines (Azo Dyes) ***		< 20 ppm
Flame retardants ***		< 5 ppm
Nitrosamines ***		< n.d.
Phthalates***		< 500 ppm
PAH**		Sum < 10 ppm, Bap < 1 ppm

Δ Pb < 0.2 ppm; Cr < 1.0 ppm; Hg < 0.02 ppm; As < 0.2 ppm; Cu < 25 ppm, Antimony (Sb) < 5 ppm, Cadmium (Cd) < 0.1 ppm, Cobalt (Co) < 1 ppm, Nickel (Ni) < 0.5ppm

* Required when anti-moulding agent is used

** Sum 18 PAH, following ZEK 01-08 for GS-Mark certification for Category 2

*** See list below

Azo – Amines

4-aminodiphenyl, benzidine, 4-chloro-o-toluene, 2-naphthylamine, o-amino-azotoluene, 2-amino-4-nitrotoluene, p-chloroaniline, 2,4-diaminoanisole, 4,4'-diaminodiphenylmethane, 3,3'-dichlorobenzidine, 3,3'-dimethoxybenzidine, 3,3'-dimethylbenzidine, 3,3'-dimethyl-4,4'-diaminodiphenylmethane, p-cresidine, 4,4'-methylene-bis-(2-chloroaniline), 4,4'-oxydianiline, 4,4'-thiodianiline, o-toluidine, 2,4-diaminotoluene, 2,4,5-trimethylaniline, 4-aminoazobenzene, o-anisidine.

Flame retardants

Brominated and chlorinated flame retardants (e.g. Penta BDE, Octa BDE, TRIS, PBBs, TCEP, TEPA, Deca BDE, BDBBP, PCBs, PCNs, PCTs)

Nitrosamines NDMA, NDEA, NDPA, NDBA, NPIP, NPYR, NMOR, NMPhA, NEPhA

Phthalates (17P) DINP, DNOP, DEHP, DIDP, BBP, DBP, DMEP, DHNUP, DIHP, DnHP, DIBP, DiPP, DnPP, NPiPP, DMP, DEP, 1,2-Benzenedicarboxylic acid, dipentylester, branched and linear