

## PRODUCT DEVELOPMENT GUIDELINES

The Sutter Group is focused on the development and marketing of products, in the sense of chemical formulations and relative packaging, with high performance which are at the same time safe for users and have a reduced environmental impact.

In the development of new formulas (including the improvement of existing ones) and the development/validation of packaging, the Sutter Group carefully follows the following principles:

- Compliance with the regulations in force in every country where the products are marketed, through a conservative approach that tends to always consider the most restrictive laws.
- In the event that, in certain countries, there are particular regulations or established practices that go beyond that required by standard legislation, all these peculiarities are meticulously analysed and complied with.
- Voluntary programmes on the use of ingredients, which go beyond the legal requirements:
  - Raw materials classified as carcinogenic, mutagenic and/or toxic for the reproductive cycle (also known as CMRs) are voluntarily not included in the formulations.
  - Raw materials in aqueous solution or in a preparation are evaluated not only for the intrinsic hazard but also for the possible presence of CMR impurities. If such impurities are present, other chemical alternatives are evaluated.
  - Substances classified as SVHCs (Substances of Very High Concern) or ESDs (Endocrine System Disrupters) are voluntarily not included in the formulations.
  - Raw materials in aqueous solution or in a preparation are evaluated not only for the intrinsic hazard but also for the possible presence of SVHC/ESD impurities. If such impurities are present, other chemical alternatives are evaluated.
  - Substances classified as VOCs (Volatile Organic Compounds) are not generally used and are replaced, where possible, by technically equivalent raw materials. In the event that their use in the formulation is essential to guarantee the effectiveness of the product, the % inclusion in the formula is minimised.
- Since the classification of chemical substances is constantly evolving, the Sutter Group's Research and Development Laboratory constantly monitors the hazard profiles of substances and undertakes appropriate reformulation programs to eliminate ingredients which deviate from the general principles indicated in this document.
- Regarding *Animal Testing*, the Sutter Group expresses its opposition to the determination of product hazards through experimental practices involving animals. On the contrary, the Sutter Group determines product classification/labeling using the empirical calculation methods established by law. Where necessary, the classification of preparations is determined using alternative methods such as *in-vitro* tests. No formulation put on the market by the Sutter Group is tested on animals.

