

Thule Group Restricted Substances List

Thule Group AB and its affiliates (or the “Company”) (Corp. Reg No. 556770-6311)

Adopted 4th September 2025

Approved by Mattias Ankarberg, CEO & President



Thule Group >>

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Normative pages

Purpose

Thule Group aims to contribute to a more sustainable world by offering innovative, high-quality products that inspire people to live an active life.

The Thule Group Restricted Substances List (hereinafter referred to as RSL) communicates Thule Group requirements concerning chemical substances in materials and products (see page 3 - Definitions), with the purpose of ensuring product compliance so that the above goal can be met. The list includes both legal requirements and Thule Group's own strict requirements.

Scope and application

Any materials and products supplied to Thule Group to be included in or distributed as articles by Thule Group shall comply with the requirements listed in the Thule Group RSL at all times.

The intentional use of substances or chemical products in the manufacturing of materials and products, is also within scope of the Thule Group RSL, regardless of whether or not the substances remain in the finished materials or products. For these cases, the Thule Group RSL distinguishes between Restricted and Prohibited substances, with more detail found under Definitions.

The RSL is structured with general requirements that apply for all products and materials, as well as material and/or application specific requirements. The general requirements consist of one section for legal based requirements and one section for substances. The material and application specific sections apply only to products containing these materials or that are in scope of these applications in any part of the component or complex object.

Validity and summary of changes

0010 - Thule Group Restricted Substances List version 4.0 replaces 0010 - Thule Group Restricted Substances List version 3.0

Thule Group reviews and updates the RSL at minimum on an annual basis, to comply with applicable laws and proactively work with chemical compliance. The Thule Group RSL may be stricter than the legal requirements. The most current version of the Thule Group RSL applies.

All materials and products supplied to Thule Group shall comply with the latest version of the RSL, regardless of when they were originally approved. Suppliers to Thule Group shall stay up to date with any changes to the Thule Group RSL so as to maintain compliance status of any supplied materials and products with the latest version of the RSL.

The latest version of the Thule Group RSL, along with supporting information, can be found at www.thulegroup.com

Changes since the last revision, see Appendix I.

Liability and responsibility

- Thule Group reserves the right to conduct random testing of materials and products at any time and at any stage of production.
- Test results provided to Thule Group shall be performed by a third-party accredited laboratory.
- Thule Group reserves the sole right to grant/revoke authorization for use of substances limited by this RSL, for materials and products supplied to Thule Group.
- Suppliers must provide Thule Group with necessary documentation upon request, including Safety Data Sheets (SDS), safe use instructions and material certificates.
- Suppliers must inform Thule Group of any substances (name, CAS-No, amount) known to be in the supplied material(s) that are listed as declarable substances in the Thule Group RSL.
- Suppliers must adhere to all applicable legal requirements, regardless of whether those requirements are captured in this document.
- Full Material Declarations (FMD) shall when available be sent to Thule Group at chemicalcompliance@thule.com.

Definitions

Article	An object which during production is given a special shape, surface or design, which determines its function to a greater degree than does its chemical composition.
CAS No.	Chemical abstract services registration number.
Complex object	Any object made up of more than one article.
Declarable	If a declarable substance is present in materials and products, this shall be reported to Thule Group. Substances listed as declarable may be subject to reporting requirements (e.g. Prop 65 or Article 33 in REACH). These substances shall be reported to Thule Group, in accordance with applicable regulations. Note that not all substances subject to reporting requirements are individually listed in the RSL.
Limit value	The maximum amount of chemical substances permitted in the articles for usage ranges A, B and C. If the substance is prohibited, the limit value indicates the maximum amount permitted in form of contamination.
Materials and products	Refer to all finished goods, articles, components, materials, and packaging supplied to Thule Group.
ppm	Parts per million, equal to mg/kg: 1000 ppm = 1000 mg/kg = 0.1 weight%
Prohibited	The substance is prohibited from use in the production process or from being intentionally added to the materials and products supplied to Thule Group. Thule Group acknowledges that low concentrations of the substance may in any case be found due to impurities. Authorization for use is required from Thule Group if no alternative is available e.g. in raw materials, production processes.
Restricted	A substance is permitted to be used in the production process or to be added to the product within the specified limit value.
Several	When a substance group is not defined by a single CAS number, these will be listed as several. The CAS numbers included in the substance group will often be defined in an appendix.
Substance group	A collection of substances with similar chemical structure, composition, or function.
SVHC	Substances of Very High Concern, legally defined by the REACH Candidate list.

Usage range

Usage ranges classify materials and products according to their foreseeable use. The usage range for materials and products is defined in the specification prepared by Thule Group. The three usage ranges (A, B, C) are defined:

- Usage range **A**: Intended for children 0-3 years, foreseeable or intended to be placed in the mouth or coming into prolonged skin contact.
- Usage range **B**: Long-term skin contact (>30 seconds) or short-term repetitive skin contact during intended or foreseeable use.
- Usage range **C**: Short-term skin contact (up to 30 seconds), or no skin contact during intended or foreseeable use.

Third party requirements

If the materials or products are specified to meet requirements set by a third-party organization, the supplier must comply with the Thule Group RSL, and the chemical restrictions set by the third-party organization. Examples of third-party organizations are OEKO-TEX® and bluesign®.

Due diligence

Thule Group expects supplied materials and products to be compliant with the RSL and suppliers should be prepared to provide evidence of material/product compliance. The evidence shall be substantiated by detailed knowledge about the content of the material, manufacturing process and/or chemical testing. When testing is considered the test methods used shall have a detection limit lower than the limits defined by the RSL. When a legal requirement specifies a certain test method, this test method shall be used. Appropriate test methods can be discussed with Thule Group.

Support

Any questions related to the RSL shall be addressed to: chemicalcompliance@thule.com

General requirements for all types of materials and products

The following requirements must be fulfilled for all types of materials and products at all times. NOTE: the specific requirements applicable to the material and/or product category must also be fulfilled. See material specific requirements in the subsequent sections of the document. The limit value(s) for a substance may be stricter for specific material and/or product categories.

Legal requirements

Group of substances or legislation	Substances	Limitation type	Limit value (mg/kg)	Declarable	Thule Group requirements/comments
Stockholm convention	According to the convention: Text of the Convention (pops.int)	Prohibited	Refer to legislation		
Regulation (EU) No 2019/1021 Persistent organic pollutants (POP)	The latest valid list at: List of substances subject to POPs Regulation - ECHA (europa.eu)	Prohibited	Refer to legislation		The Stockholm convention and Aarhus Protocol are implemented in the European Union by the POPs Regulation.
Toxic Substances Control ACT (TSCA) Title 40/Chapter I/Subchapter R/ Part 751	Latest valid list at: 40 CFR Part 751	Prohibited	Refer to legislation	Yes	
The Safe Drinking Water and Toxic Enforcement Act of 1986 (California Proposition 65)	The latest valid list at: The Proposition 65 List - OEHHA (ca.gov)		Refer to legislation	Yes	Also see page 12.
Regulation (EC) No 1907/2006 (article 59(10)) REACH Candidate list	The latest valid list at: Candidate List of substances of very high concern for Authorisation – ECHA (europa.eu)	Restricted	Refer to legislation	Yes	Thule Group limit value for SVHC substances is 1000 mg/kg if not other specified in this document. When applicable, SCIP reporting must be completed.
Regulation (EC) No 1907/2006 REACH Annex XIV	The latest valid list at: Authorisation List - ECHA (europa.eu)	Prohibited	Refer to legislation	Yes	

Group of substances or legislation	Substances	Limitation type	Limit value (mg/kg)	Declarable	Thule Group requirements/comments
Regulation (EC) No 1907/2006 REACH Annex XVII	The latest valid list at: Substances restricted under REACH - ECHA (europa.eu)	Restricted	Refer to legislation		
Regulation (EU) 2025/40 Packaging and packaging waste^{New}	The latest valid list at: Regulation - EU - 2025/40 - EN - EUR-Lex	Restricted	Refer to legislation		Enters into force 12 August 2026
South Korean Common Safety Standards for Children's Products Public Notice 2015-0110^{New}		Restricted	Refer to standard		Applicable to products intended for children.
EN 71-3		Restricted	Refer to standard		Applicable to products intended for children.
EN 71-12^{New}		Restricted	Refer to standard		Applicable to products intended for children.

^{New} New legislation included in RSL

Substance requirements

Substance group or function	Substance	CAS	Limitation Type	Limit Value (mg/kg)			Declarable	Thule Group requirements/comments
				A	B	C		
Alkylphenols (APs) and Alkylphenol-ethoxylates (APEOs)	Nonylphenol* (NP)	Several, e.g.: 104-40-5 25154-52-3 84852-15-3	Prohibited	Sum of groups: 10			Yes	Limit applies to the sum of NP and OP
	Octylphenol* (OP)	Several, e.g.: 140-66-9 1806-26-4 27193-28-8	Prohibited				Yes	
	Nonylphenol* (NP)	Several, e.g.: 104-40-5 25154-52-3 84852-15-3	Prohibited	Sum of groups: 100			Yes	Limit applies to the sum of NP, OP, NPEO and OPEO
	Octylphenol* (OP)	Several, e.g.: 140-66-9 1806-26-4 27193-28-8	Prohibited				Yes	
	Nonylphenoethoxylates* (NPE)	Several, e.g.: 9016-45-9 26027-38-3 37205-87-1 68412-54-4 127087-87-0	Prohibited				Yes	
	Octylephenoethoxylates* (OPE)	Several, e.g.: 9002-93-1 9036-19-5 68987-90-6	Prohibited				Yes	

*Substance/s with updated limit/s

Substance group or function	Substance	CAS	Limitation Type	Limit Value (mg/kg)			Declarable	Thule Group requirements/comments
				A	B	C		
Aldehydes	Formaldehyde ^{New}	50-00-0	Restricted	0,062 mg/m3				Test method: Appendix 14 in Annex XVII (REACH).
Asbestos fibers	Asbestos	Several, e.g.: 77536-66-4 12172-73-5 77536-67-5 12001-28-4 77536-68-6	Prohibited	Not detected			Yes	
Biocides	All substances with a biocidal function must be declared as well as be approved within EU as an active substance for the use/material according to Biocidal Products Regulation (EU) No 528/2012 (or until 2024 under evaluation) even if no claim of biocidal action is made. Link to approved list of biocides: Information on biocides - ECHA (europa.eu)		Prohibited/ Restricted	-			Yes	Any use of biocidal agents must be expressly approved by Thule Group.
Bisphenols	Bisphenol A (BPA)*	80-05-7	Prohibited	10	10	1000	Yes	
	Bisphenol B (4,4'-(1-methylpropylidene)bisphenol)*	77-40-7		10	10	1000	Yes	
	Bisphenol S (4,4' - Sulfonyldiphenol)*	80-09-1		10	10	1000	Yes	
	2,2-bis(4'-hydroxyphenyl)-4-methylpentane*	6807-17-6		10	10	1000	Yes	
	Bisphenol F (4,4-Methylene-diphenol)*	620-92-8		100	100	1000		

^{New} New substance included in RSL

* Substance/s with updated limit/s

Substance group or function	Substance	CAS	Limitation Type	Limit Value (mg/kg)			Declarable	Thule Group requirements/comments
				A	B	C		
Chlorinated Paraffins	Tetradecane, chloro, derivatives	198840-65-2	Prohibited	100	1000	1000		
Flame Retardants	Several- see appendix II	Appendix II	Prohibited	Appendix II			Yes	<p>Intentional use of flame retardants must be approved by Thule Group.</p> <p>Information on specific flame retardant treatment shall be documented and shared with Thule Group. Minimum information:</p> <ul style="list-style-type: none"> • Flame retardant trade name • Manufacturer • Active ingredients and their concentrations • Safety Data Sheet
Fragrances (Perfumes and/or masking agents)	Substances used as perfumes and/or masking substances		Restricted	-			Yes	Substances used as perfumes and/or masking substances must be declared and are not allowed without specific approval from Thule Group.
Metals and metal compounds in non-metallic materials and products	Antimony	Several	Restricted	1000				Test method according to EN 71-3.
	Arsenic		Prohibited	1000			Yes	
	Barium		Restricted	1000				Metals and metal compounds in metallic materials and products are exempted – see Material specific requirements.
	Cadmium		Prohibited	75**			Yes	
	Chromium VI		Prohibited	0,053**			Yes	Textile fabrics and trims: see Material specific requirements for additional requirements.
	Cobalt		Restricted	130			Yes	
	Copper		Restricted	7700				
	Lead		Prohibited	90**			Yes	** Additional requirement for packaging: Sum of group 100 ppm according to Packaging directive 94/62/EC.
	Mercury		Prohibited	1**			Yes	
	Nickel		Restricted	930			Yes	

Substance group or function	Substance	CAS	Limitation Type	Limit Value (mg/kg)			Declarable	Thule Group requirements/comments
				A	B	C		
Nanomaterials	Definition of nanomaterial - European Observatory for Nanomaterials (europa.eu)		Restricted	-			Yes	Suppliers have the duty to inform the Thule Group representative about the intentional use of nanomaterials.
Organotin Compounds	Appendix III	Appendix III	Prohibited	Appendix III				
Other	Tris(nonylphenyl) phosphite	26523-78-4	Prohibited	100	1000	1000	Yes	
	Reaction mass of: triphenylthiophosphate and tertiary butylated phenyl derivatives ^{New}	192268-65-8	Restricted	1000			Yes	
Polycyclic Aromatic Hydrocarbons (PAH)	Several- see appendix IV	Appendix IV	Prohibited	Appendix IV				
Polymers	PVC (Polyvinyl chloride)	9002-86-2	Prohibited	-			Yes	
PFAS	Poly- and/or perfluorinated substances (PFAS) are substances that contain at least one fully fluorinated methyl (CF ₃ -) or methylene (-CF ₂ -) carbon atom (without any H/Cl/Br/I atom attached to it). (Definition as per OECD)	Several	Prohibited	100 (Contamination limit of total organic fluorine compounds)			Yes	Contamination limit applies for PFAS not already regulated by legal restriction. From 1 January 2027 the limit will be 50 ppm.

^{New} New substance included in RSL

REACH Article 33 and SCIP requirement

REACH Regulation (EC) No 1907/2006 article 33 puts a demand on informing customers if an article contains a substance on the Candidate list in a concentration greater than 0.1weight% (1000 ppm) in any of the components of a complex object.

The EU Waste Framework Directive (WFD) 2008/98/EC has been updated to serve in the transition to a circular economy. The WFD requirement supplements the information demand in REACH article 33. Companies that produce, import or supply articles containing Candidate List substances must submit information on these articles placed on the EU market to the SCIP database, as from 5 January 2021.

Requirement for suppliers within the European Union and EEA countries

For suppliers within the European Union and EEA countries, Thule Group requires a SCIP number for any article(s)/component(s) containing SVHC substances above 0.1 weight% and safe use instructions according to REACH Article 33, at latest at delivery.

For detailed information, see ECHA [Suppliers of articles - ECHA \(europa.eu\)](https://echa.europa.eu)

Requirement for non- EU suppliers

Non-EU suppliers should provide necessary information and safe use instructions, so that Thule Group can fulfil their legal obligations regarding REACH article 33 and successfully register products to the SCIP database.

For a list of requirements for non-EU suppliers, see Appendix VII.

California Proposition 65 reporting requirement

Suppliers shall notify Thule Group of the use of all known chemicals found in California Proposition 65, officially known as the Safe Drinking Water and Toxic Enforcement Act of 1986. Any California Proposition 65 chemicals either used in the manufacture of raw materials or found in the finished product must be disclosed. California Proposition 65 chemicals are not prohibited or restricted but must be disclosed by providing a warning to consumers. Link to the list of chemicals [The Proposition 65 List - OEHHA \(ca.gov\)](https://oehha.ca.gov)

PFAS

As part of the efforts and work toward compliance with rapidly evolving legislation, Thule Group is designing new products and actively updating existing products to reduce and eventually exclude the use of PFAS.

Material and/or application specific requirements

Products or materials that are comprised of multiple products or materials, must comply with each applicable set of requirements based on the material (or several types of materials). E.g. a key with an over-molded rubber grip, or a zipper sewn into a fabric.

Plastics and rubber

Note: Includes foam, composites and plastics packaging materials. The general requirements must be fulfilled along with the material specific requirements.

Substance group or function	Substance	CAS	Limitation type	Limit value (mg/kg)			Declarable	Thule Group requirements/comments
				A	B	C		
Chlorinated Ethanes	1,1,2-Trichloroethane	79-00-5	Prohibited	1000			Yes	
	1,1,1,2-Tetrachloroethane	630-20-6						
	1,1,2,2-Tetrachloroethane	79-34-5						
Chlorinated phenols	Trichlorophenols All isomers	Several, e.g. 25167-82-2 15950-66-0 933-78-8 933-75-5 88-06-2	Prohibited	Sum of group:			Yes	Limit applies to sum of group of substances.
		0.5		0.5	5			
	Tetrachlorophenols All isomers	25167-83-3 4901-51-3 58-90-2 935-95-5	Prohibited	Sum of group:				Limit applies to sum of group of substances.
	Pentachlorophenol	87-86-5	Prohibited	0.5	0.5	5	Yes	
Other	2-(2H-benzotriazol-2-yl)-4-(1,1,3,3-tetramethylbutyl)phenol (UV-329)	3147-75-9	Restricted	1000			Yes	
	Bumetrisole (UV-326)	3896-11-5	Restricted	1000			Yes	
	Dimethylfumarate (DMFu)	624-49-7	Prohibited	0,1				

Substance group or function	Substance	CAS	Limitation type	Limit value (mg/kg)			Declarable	Thule Group requirements/comments
				A	B	C		
Other	Formamide	75-12-7	Prohibited	200	200	1000	Yes	
	Hydrazine, its salts and hydrates	Several e.g. 302-01-2 7803-57-8	Prohibited	200	200	1000	Yes	
	Melamine	108-78-1	Restricted	1000			Yes	
	Pentachlorothiophenol (PCTP)	133-49-3	Prohibited	10 000				
	Triphenylphosphate ^{New}	115-86-6	Restricted	1000			Yes	
Plasticizers	Several-see appendix V	Appendix V	Prohibited	Appendix V				
Solvents	N,N-Dimethylformamide (DMFa)	68-12-2	Restricted	500	500	1000	Yes	

^{New} New substance included in RSL

Metals

Note: The general requirements must be fulfilled along with the material specific requirements

Substance group or function	Substance	CAS	Limitation type	Limit value (mg/kg)			Declarable	Thule Group requirements/comments
				A	B	C		
Metals – Total Content	Lead	7439-92-1	Restricted	90	90	1000	Yes	Exemption: Lead is allowed to be used after approval from Thule Group in copper-based alloys and turned steel.
Metals – Release	Nickel	7440-02-0	Restricted	0.5 [#]	0.5 [#]	-	Yes	

[#]unit: µg/cm²/week

Textile fabrics and trims

Note: The general requirements must be fulfilled along with the material specific requirements. In addition, parts of the trims made of non-textile material need to comply with their material specific requirement section. For example, a foam laminated to a fabric shall comply with section Plastics and rubber, and a zipper comprising of plastic and/or metal parts shall comply with Plastics and rubber, and Metals, respectively.

Substance group or function	Substance	CAS	Limitation type	Limit value (mg/kg)			Declarable	Thule Group requirements/comments
				A	B	C		
Aldehydes	Formaldehyde	50-00-0	Prohibited	16	75	300	Yes	
Chlorinated Ethanes	1,1,2-Trichloroethane	79-00-5	Prohibited	1000			Yes	
	1,1,1,2-Tetrachloroethane	630-20-6						
	1,1,2,2-Tetrachloroethane	79-34-5						
Chlorinated phenols	Trichlorophenols All isomers	Several, e.g. 25167-82-2 15950-66-0 933-78-8 933-75-5 88-06-2	Prohibited	Sum of group:			Yes	Limit applies to sum of group of substances.
				0.5	0.5	5		
	Tetrachlorophenols All isomers	25167-83-3 4901-51-3 58-90-2 935-95-5	Prohibited	Sum of group:				Limit applies to sum of group of substances.
	Pentachlorophenol	87-86-5	Prohibited	0.5	0.5	5	Yes	
Colorants and dye stuff	Several – see appendix VI	Appendix VI	Prohibited	Appendix VI				
Metals and metal compounds in non-metallic materials and products	Antimony	Several	Restricted	30				Test method according to EN16711-2.
	Arsenic		Prohibited	1			Yes	
	Barium		Restricted	1000				
	Cadmium		Prohibited	1			Yes	
	Chromium III		Restricted	1	2	2		
	Chromium VI		Prohibited	1			Yes	Test method according to EN ISO 17075-1.
	Cobalt		Restricted	1	4	4	Yes	Test method according to EN16711-2.
	Copper		Restricted	25	50	50		
	Lead		Prohibited	1			Yes	

Substance group or function	Substance	CAS	Limitation type	Limit value			Declarable	Thule Group requirements/comments
				A	B	C		
Metals and metal compounds in non-metallic materials and products	Silver	Several	Prohibited	Not detected			Yes	Test method according to ASTM E3171-21a.
Other	2-(2H-benzotriazol-2-yl)-4-(1,1,3,3-tetramethylbutyl)phenol (UV-329)	3147-75-9	Restricted	1000			Yes	
	Bumetrisole (UV-326)	3896-11-5	Restricted	1000			Yes	
	Dimethylfumarate (DMFu)	624-49-7	Prohibited	0,1				
	Quinoline	91-22-5	Restricted	50			Yes	
Plasticizers	Several-see appendix V	Appendix V	Prohibited	Appendix V				
Siloxanes	Octamethylcyclotetra-siloxane (D4)	556-67-2	Restricted	1000			Yes	
	Decamethylcyclopenta-siloxane (D5)	541-02-6					Yes	
	Dodecamethylcyclohexa-siloxane (D6)	540-97-6					Yes	
Solvents	Benzene	71-43-2	Prohibited	5			Yes	
	N,N-Dimethylacetamide (DMAc)	127-19-5	Prohibited	500	500	1000	Yes	
	N,N-Dimethylformamide (DMFa)	68-12-2	Restricted	500	500	1000	Yes	
	N-methyl-2-pyrrolidone (NMP)	872-50-4	Prohibited	500	500	1000	Yes	

Electronics and batteries

Note: Suppliers of electrical parts, electronics, and/or batteries, must also comply with relevant material specific requirements as detailed in this RSL

Group of substances, function or legislation	Substances	CAS	Limitation type	Limit value (mg/kg)	Declarable	Thule Group requirements/comments
Directive 2011/65/EU RoHS	According to RoHS Directive: Restriction of Substances in Electrical and Electronic Equipment		Restricted	Refer to legislation	Yes	
Regulation (EU) 2023/1542 Batteries and waste batteries	According to regulation: Battery and waste batteries regulation		Restricted	Refer to legislation	Yes	
Administrative Measure on the Control of Pollution Caused by Electronic Information Products (China RoHS)	According to Standard GB/T 26572-2011: Requirements of concentration limits for certain restricted substances in electrical and electronic products		Restricted	Refer to legislation	Yes	

Paper and cardboard

Note: Includes packaging materials. The general requirements must be fulfilled along with the material specific requirements.

Substance group or function	Substance	CAS	Limitation type	Limit value (mg/kg)			Declarable	Thule Group requirements/comments
				A	B	C		
Chlorinated phenols	Trichlorophenols All isomers	Several, e.g. 25167-82-2 15950-66-0 933-78-8 933-75-5 88-06-2	Prohibited	Sum of group:			Yes	Limit applies to sum of group of substances.
			0,5	0,5	5			
	Tetrachlorophenols All isomers	25167-83-3 4901-51-3 58-90-2 935-95-5	Prohibited	Sum of group:				Limit applies to sum of group of substances.
			0,5	0,5	5			
	Pentachlorophenol	87-86-5	Prohibited	0.5	0.5	5	Yes	
Mineral oil	According to legislation: French legislative No 2020-105 (AGEC)		Prohibited	Refer to legislation				Concerns packages

Chemical products

Note: Chemical products, e.g. glue, lubricants, surface treatment. The listed substances shall also be considered in chemical products used for purchased products and in assembly of supplied components.

Substance group or function	Substances	CAS	Limitation type	Limit value (mg/kg)			Declarable	Thule Group requirements/comments
				A	B	C		
Other	Decamethyltetrasiloxane ^{New}	141-62-8	Restricted	1000			Yes	
	2-(dimethylamino)-2-[(4-methylphenyl)methyl]-1-[4-(morpholin-4-yl)phenyl]butan-1-one	119344-86-4	Restricted	1000			Yes	
	Octamethyltrisiloxane ^{New}	107-51-7	Restricted	1000			Yes	
	Oligomerisation and alkylation reaction products of 2-phenylpropene and phenol	EC No: 700-960-7	Restricted	1000			Yes	

^{New} New substance included in RSL

Automotive

Note: Products or materials intended to be used in products for the automotive industry may be subject to additional specific requirements

GADSL

The purpose of the Global Automotive Declarable Substances list (GADSL) is to communicate the use of certain substances in automotive products throughout the supply chain. In addition to Thule Group RSL, suppliers of materials and products for automotive shall also align with the GADSL requirements for products classified as FI/FA (For Information / For Assessment). Furthermore, Thule Group requires that this information shall be reported and kept up to date in IMDS (International Material Data System). Link to: [GADSL](#)

Appendix I. Revision History

Current version:

0010 – Thule Group Restricted Substances List Version 4.0.

Change log

Version	Change	Implemented
4.0	Normative pages: Minor corrections in the text. Conflict minerals removed, covered by Thule Group Supplier Code of Conduct .	September 2025
	General requirements, legal requirements: PPWR (EU) 2025/40, EN71-12 and South Korean Common Safety Standards for Children's Products Public Notice 2015-0110 added.	
	General requirements, Substance requirements: New substances added – marked with ^{New} . Substances with new limits - marked with *.	
	Plastics and rubber: New substance added - marked with ^{New} .	
	Textile fabrics and trims: New substances added - marked with ^{New} .	
	Electronics and batteries: Dechlorane moved to Appendix Flame retardants.	
	Wood-based materials: Removed. Formaldehyde is covered in General requirements, substances.	
	Chemical products: New substances added - marked with ^{New} . 3 substances removed.	
	Appendix II - Flame retardants: New substances added - marked with ^{New} . Substances with new limits - marked with *. 10 substances have been removed.	
Appendix VI – Colorants and dye stuff: New substance added - marked with ^{New} .		
3.0	Normative pages: Overall: Minor corrections in the text. Liability and responsibility revised.	September 2024
	General requirements, Legal requirements: TSCA 40 CFR Part 751 added. RoHS removed (still in Electronics and batteries)	
	General requirements, Substance requirements: Silver and Colorants moved to Textiles fabrics and trims (and as a consequence change in numbering of the appendices).	
	Plastics and rubber: New substances added - marked with ^{New} .	
	Textile fabrics and trims: Minor corrections in the text. New substances added - marked with ^{New} . Substances with new limits - marked with *. Formamide and Nickel removed (still in Plastics and rubber and Metals, respectively). Colorants: New substances added - marked with ^{New} . Substances with new limits - marked with *. Four colorants have been removed.	
	Electronics and batteries: Administrative Measure on the Control of Pollution Caused by Electronic Information Products (China RoHS) added. New substance added - marked with ^{New} .	
	Paper and Cardboard: French legislative No 2020-105 (AGEC) added.	
	Chemical products: New substances added - marked with ^{New} .	
	Appendix II – Flame retardants: Minor correction in the text. Melamine removed (still in General requirements).	
2.0	Normative pages: Minor corrections in the text.	November 2023
	General requirements/Legal requirements: Referred to legislation for limit values.	
	Substance requirements included in either General requirements, Material and/or product specific, additional requirements, or appendices: Several substances removed as they are already covered by legal requirements.	

	<p>Substance requirements included in either General requirements, Material and/or product specific, additional requirements, or appendices: The limits have been reviewed to clarify the importance of the usage range. Note that for some substances “Usage A” has a lower limit than legal requirements. Substance groups or substances with changed limit are marked with *.</p> <p>New substances added - marked with ^{New}.</p> <p>New category of material specific requirements: Wood-based materials.</p>	
1.0	0010 - Thule Group Restricted Substances List version 1.0 replaces D04-001 Thule Group Prohibited and Restricted substances list Rev. 10.0 and D04-003 The Thule Group Basic Statutory Requirements Rev 2.0.	October 2022

Appendix II. Flame retardants

The table below shows a selection of prohibited flame retardants in all type of materials but note that statutory requirements also apply. The limit value indicates the maximum amount permitted in form of contamination.

Substances	CAS	Limit value (mg/kg)		
		A	B	C
2,2-Bis(bromomethyl)-1,3-propanediol (BBMP)*	3296-90-0	10	10	1000
2-ethylhexyl-2,3,4,5-tetrabromobenzoate (TBB) ^{New}	183658-27-7	10	10	1000
Antimony trioxide ^{New}	1309-64-4	10	10	1000 [#]
Bis (2,3-dibromopropyl) phosphate (BDBPP)*	5412-25-9	10	10	10
Bis(2-ethylhexyl)-3,4,5,6-tetrabromophthalate (TBPH) ^{New}	26040-51-7	10	10	1000
Decabromodiphenyl ether (DecaBDE) ^{§ New}	1163-19-5	10	10	10
Dechlorane™ Plus*	13560-89-9, 135821-74-8, 135821-03-3	5	5	5
Heptabromodiphenyl ether (HeptaBDE) ^{§ New}	68928-80-3, 207122-16-5, 446255-22-7	10	10	10
Hexabromodiphenyl ether (HexaBDE) ^{§ New}	36483-60-0, 68631-49-2, 207122-15-4	10	10	10
Nonabromodiphenyl ether (NonaBDE) ^{§ *}	63936-56-1	10	10	500 ^{§§}
Octabromodiphenyl ether (OctaBDE) ^{§ New}	32536-52-0	10	10	500 ^{§§}
Pentabromodiphenyl ether (PentaBDE) ^{§ New}	32534-81-9, 60348-60-9	10	10	10
Poly Brominated Biphenyls (PBBs)*	Several, eg. 59536-65-1, 36355-01-8, 26264-10-8, 59080-40-9	10	10	1000
Tetrabromodiphenyl ether (TetraBDE) ^{§ New}	40088-47-9, 5436-43-1	10	10	10
Triethylenephosphoramidate, Tri(aziridin-1-yl)phosphine oxide (TEPA)*	545-55-1	10	10	1000
Tris(2,3-dibromopropyl)phosphate (TRIS)*	126-72-7	8	8	8
Tris-(2-chloro-1-methylethyl)phosphate (TCPP)*	13674-84-5	10	10	1000
Tris(methylphenyl) phosphate*	1330-78-5	10	10	1000
Tris-[2-chloro-1-(chloromethyl)ethyl]phosphate (TDCP)*	13674-87-8	10	10	1000

^{New} New substance included in RSL *Substance/s with updated limit/s

[#] Usage range C in non-juvenile products are exempt

^{§§} Limit value for usage range C is the sum of the BDEs marked with §

Appendix III. Organotin compounds

All organotin compounds listed in the table below are prohibited for all type of materials, the limit value indicates the maximum amount permitted in form of contamination.

Substance	CAS	Limit Value (mg/kg)		
		A	B	C
Monomethyltin compounds (MMT)	Several	12 (each)	12 (each)	1000 (each)
Monobutyltin compounds (MBT)	Several			
Monophenyltin compounds (MPhT)	Several			
Monooctyltin compounds (MOT)	Several			
Dimethyltin compounds (DMT)	Several			
Dipropyltin compounds (DPT)	Several			
Dibutyltin compounds (DBT)	Several, 1002-53-5, 683-18-1			
Diphenyltin compounds (DPhT)	Several			
Dioctyltin compounds (DOT)	Several, 15231-44-4, 91648-39-4, 3648-18-8			
Trimethyltin compounds (TMT)	Several			
Tripropyltin compounds (TPT)	Several			
Tributyltin compounds (TBT)	Several, 56573-85-4, 56-35-9, 1461-22-9, 1983-10-4, 2155-70-6, 4342-36-3, 24124-25-2, 85409-17-2			
Triphenyltin compounds (TPhT)	Several, 668-34-8			
Trioctyltin compounds (TOT)	Several			
Tetraethyltin compounds (TeET)	Several			
Tetrabutyltin compounds (TeBT)	Several			
Tetraoctyltin compounds (TeOT)	Several			
Tricyclohexyltin compounds (TCyHT)	Several			
2-ethylhexyl 10-ethyl-4,4-dioctyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate (DOTE)	15571-58-1			
2-ethylhexyl 10-ethyl-4-[[2-[(2-ethylhexyl)oxy]-2-oxoethyl]thio]-4-octyl-7-oxo-8-oxa-3,5-dithia-4-stannatetradecanoate (MOTE)	27107-89-7			

Appendix IV. Polycyclic Aromatic Hydrocarbons (PAH)

All polycyclic aromatic hydrocarbons (PAH) listed in the table below are prohibited for all type of materials, the limit value indicates the maximum amount permitted in form of contamination.

Substance	CAS	Limit value (mg/kg)		
		A	B	C
Anthracene	120-12-7	Sum of group: 1	Sum of group: 5	Sum of group: 20
Fluoranthene	206-44-0			
Phenanthrene	85-01-8			
Pyrene	129-00-0			
Benzo[a]anthracene	56-55-3	<0.2 (each)	<0,2 (each)	<0,5 (each)
Benzo[b]fluoranthene	205-99-2			
Benzo[j]fluoranthene	205-82-3			
Benzo[k]fluoranthene	207-08-9			
Benzo[g,h,i]perylene	191-24-2			
Benzo[a]pyrene	50-32-8			
Benzo[e]pyrene	192-97-2			
Chrysene	218-01-9			
Dibenzo[a,h]anthracene	53-70-3			
Ideno[1,2,3-cd]pyrene	193-39-5			
Naphthalene	91-20-3	<1	<2	<10
Sum of all PAH:		1	5	20

Appendix V. Plasticizers

All plasticizers listed in the table below are prohibited for material categories: Plastics and rubber and Textile fabrics and trims. The listed limit value indicates the maximum amount permitted in form of contamination.

Substances	CAS	Limit value (mg/kg)		
		A	B	C
Bis-(2-methoxyethyl) phthalate (DMEP)	117-82-8	100 (each)	100 (each)	100 (each)
Butyl benzyl phthalate (BBP)	85-68-7			
Dibutyl phthalate (DBP)	84-74-2			
Di-cyclohexyl phthalate (DCHP)	84-61-7			
Di(2-ethylhexyl) phthalate (DEHP)	117-81-7			
Diethyl phthalate (DEP)	84-66-2			
Diisobutyl phthalate (DiBP)	84-69-5			
Diisodecyl phthalate (DIDP)	26761-40-0, 68515-49-1			
Diisohexyl phthalate (DIHxP)	71850-09-4			
Diisononyl phthalate (DINP)	28553-12-0, 68515-48-0			
Diisooctyl phthalate (DIOP)	27554-26-3			
Diisopentyl phthalate (DIPP)	605-50-5			
Dimethyl phthalate (DMP)	131-11-3			
Di-n-hexyl phthalate (DnHP)	84-75-3			
Di-n-octyl phthalate (DnOP)	117-84-0			
Dinonyl phthalate (DNP)	84-76-4			
Di-n-pentyl phthalate (DnPP)	131-18-0			
Di-n-propyl phthalate (DPRP)	131-16-8			
n-Pentyl-isopentyl phthalate	776297-69-9			

Substances (continued)	CAS	Limit value (mg/kg)		
		A	B	C
1,2-Benzenedicarboxylic acid, di-C6-8-branched alkyl esters, C7-rich (Diisooheptyl phthalate, DIHP)	71888-89-6	100 (each)	100 (each)	100 (each)
1,2-benzenedicarboxylic acid, di-C6-10-alkyl esters	68515-51-5			
1,2-Benzenedicarboxylic acid, di-C7-11-branched and linear alkyl esters (DHNUP)	68515-42-4			
1,2-Benzenedicarboxylic acid, dihexyl ester, branched and linear (Diisohexyl phthalate, DIHP)	68515-50-4			
1,2-Benzenedicarboxylic acid, dipentyl ester, branched and linear	84777-06-0			
1,2-benzenedicarboxylic acid, mixed decyl and hexyl and octyl diesters with ≥ 0.3% of dihexyl phthalate	68648-93-1			
Sum of all plasticizers:		500	1000	1000

Appendix VI. Colorants and dye stuff

All colorants and dye stuff listed in the table below are prohibited in Textile fabrics and trims. The limit value indicates the maximum amount permitted in form of contamination.

Sustance group	Substances	CAS	Limit value (mg/kg)		
			A	B	C
Azocolorants	REACH Annex XVII, Entry 43 Appendix 8 — List of aromatic amines Appendix 9 — List of azodyes	See restriction	See restriction.		
Colorants with allergenic potential	Disperse Blue 3	2475-46-9	50 (each)		
	Disperse Blue 7	3179-90-6			
	Disperse Blue 26	3860-63-7			
	Disperse Blue 35	12222-75-2, 56524-77-7, 56524-76-6			
	Disperse Blue 102	12222-97-8			
	Disperse Blue 106	12223-01-7			
	Disperse Blue 124	61951-51-7, 15141-18-1			
	Disperse Blue 291	56548-64-2			
	Disperse Brown 1	23355-64-8			
	Disperse Orange 1	2581-69-3			
	Disperse Orange 3	730-40-5			
	Disperse Orange 37/59/76	13301-61-6, 12223-33-5, 51811-42-8			
	Disperse Red 1	2872-52-8			
	Disperse Red 11	2872-48-2			
	Disperse Red 17	3179-89-3			
	Disperse Red 151	62968-47-6			
Disperse Violet 93	66557-45-7				

Substance group	Substances	CAS	Limit value (mg/kg)		
			A	B	C
Colorants with allergenic potential	Disperse Yellow 1	119-15-3	50 (each)		
	Disperse Yellow 7	6300-37-4			
	Disperse Yellow 9	6373-73-5			
	Disperse Yellow 39	12236-29-2			
	Disperse Yellow 49	54824-37-2			
	Disperse Yellow 56	54077-16-6			
	Disperse Yellow 64	10319-14-9			
Colorants with carcinogenic potential	Acid Red 26	3761-53-3	50 (each)		
	Acid Red 114	6459-94-5			
	Basic Blue 26	2580-56-5			
	Basic Green 4	10309-95-2, 569-64-2, 2437-29-8			
	Basic Red 9/Benzenamine	569-61-9			
	Basic Violet 3	548-62-9, 603-48-5, 14426-25-6			
	Basic Violet 14	632-99-5			
	Direct Black 38	1937-37-7			
	Direct Blue 6	2602-46-2			
	Direct Blue 15	2429-74-5			
	Direct Brown 95	16071-86-6			
	Direct Red 28	573-58-0			
	Disperse Blue 1	2475-45-8			
	Disperse Orange 11	82-28-0			

Substance group	Substances	CAS	Limit value (mg/kg)		
			A	B	C
Colorants with carcinogenic potential	Disperse Orange 149	85136-74-9	50 (each)		
	Disperse Yellow 3 / solvent yellow 77	2832-40-8			
	Michler's base /Benzenamine (N,N,N',N'-tetramethyl-4,4'-methylenedianiline)	101-61-1			
	Pigment Red 104/Lead chromate molybdate sulfate red	12656-85-8			
	Pigment Yellow 34/Lead sulfochromate yellow	1344-37-2			
	Solvent Violet 8 (4,4'-bis(dimethylamino)-4''-(methylamino)trityl alcohol)/ Benzenemethanol	561-41-1			
Prohibited for other reasons	Disperse Yellow 23	6250-23-3			50
	Navy Blue, a mixture Component 1: C ₃₉ H ₂₃ ClCrN ₇ O ₁₂ S ₂ .2Na Component 2: C ₄₆ H ₃₀ CrN ₁₀ O ₂₀ S ₂ .3Na	EC-Number: 405-665-4			1000
	Reactive brown 51 ^{New}	EC-Number: 466-490-7			1000

^{New} New substance included in RSL

Appendix VII. SCIP requirements for suppliers from non-EU countries

For suppliers based outside the European Union, Thule Group requires the following information for all the articles and components containing REACH Candidate list substances/SVHCs in a concentration higher than 0.1 weight%.

- Article/component name and item number
- Other article identifiers
- Taric number/HS code/Customs number
- Safe use instructions
- Name of the substance and CAS no.
- Concentration range
- Material category/ Mixture category

If the reportable article is part of a supplied complex object, a Bill of Material (BOM) or description of how the article is linked to the complex objects and number of units are required.

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