

Thule Group Chemicals Policy

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

Originally adopted December 19th 2022.
Issued by Thor Gardarsson
Approved by Magnus Welander
Adopted by the Thule Group Board of Directors



1. Introduction to Chemicals Management

Thule Group aims to contribute to a more sustainable world by offering innovative, high-quality products that inspire people to live an active life, which are manufactured responsibly with the least possible impact on the climate and environment.

The responsible management of chemicals is a vital part of ensuring that the products Thule Group produces are safe and sustainable. This is in direct alignment with Thule Group's commitment to the United Nations Sustainable Development Goals.

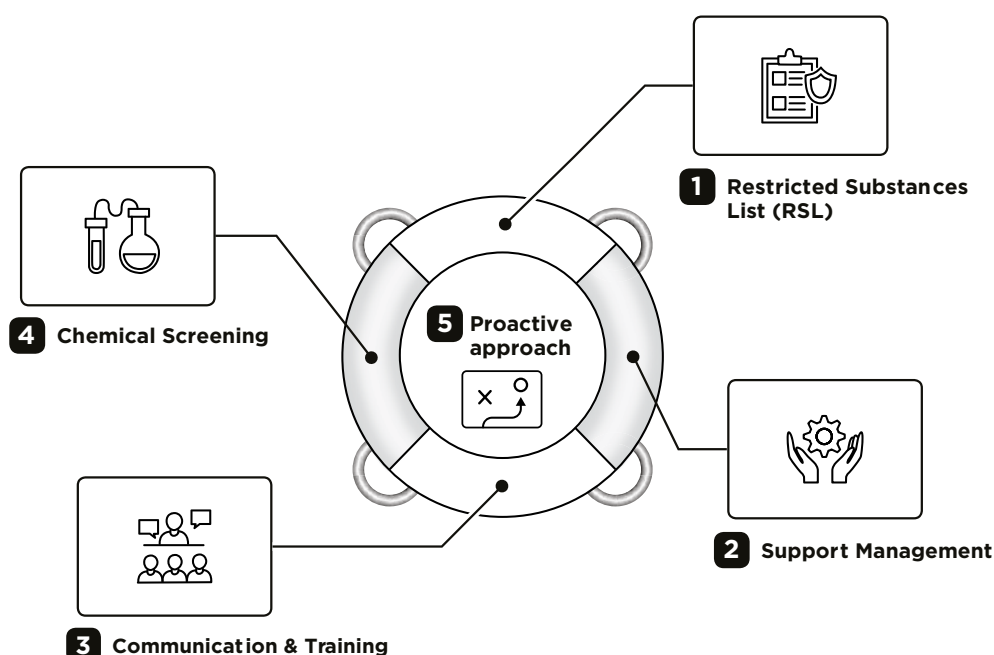
Concern for how certain chemicals when used in products affect human health and the environment, has led to development of chemicals legislation around the world and also to specific policies within Thule Group. Thule Group implements a framework consisting of multiple initiatives involving all stakeholders that addresses both legal requirements and internal limits that often go beyond what the law requires. This framework allows Thule Group to meet the goal of delivering safe products that allow for an active life, simplified.

2. Guiding Principles

- Thule Group products must not use or contain harmful substances as described in the Thule Group Restricted Substances List
- Thule Group continuously works to meet all legal requirements related to chemicals management, and sets internal limits that often go beyond what the law requires
- Thule Group strives to avoid the use of potentially problematic substances even if they are legally permitted
- Thule Group seeks to be transparent on the use of chemicals in its product portfolio

3. Chemical Compliance Framework

In order to implement the ambitions of the Chemicals policy, Thule Group has devised a chemical compliance framework. This framework is implemented by the Chemical compliance team which is part of the Product compliance department. The below graphic illustrates the elements of the framework.



3.1 Thule Group Restricted Substances List (RSL)

The Thule Group RSL communicates requirements related to use of substances in materials and products, or processes used for manufacture of materials and products. The RSL is updated annually or in conjunction with updates to regulations.

The RSL is covered in agreements with suppliers.

3.2 Support Management

The chemical compliance group manages support requests from all stakeholders. This way responsible chemical management is incorporated into the core of our business.

3.3 Communication & Training

Successful chemicals management relies on good communication with partners in the supply chain to ensure full understanding of the materials used in products. This includes ensuring that Thule Group employees and partners are trained appropriately on applicable requirements.

3.4 Chemical Screening

Thule Group conducts regular chemical screening on products that are in production. This testing is done in reference to requirements set in the RSL to ensure continued compliance. Chemicals testing as part of legal requirements is also an integral part of the chemicals management process. All testing is done at third party accredited test laboratories.

3.5 Proactive Approach

Thule Group monitors upcoming regulations globally, ensuring uninterrupted compliance as statutory requirements are updated. Thule Group also strives for substitution of problematic substances as alternatives are made available.

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Thule Group



Magnus Welander
CEO & President



Thule Group HQ
Fosievägen 13
SE - 214 31 Malmö
Telephone: +46 40 635 90 00
www.thulegroup.com