June 2024

Product Safety & Stewardship Commitment

We believe that product stewardship is one of the cornerstones of a successful and sustainable business. KRONOS is firmly committed to strong product stewardship through robust business processes that identify, manage, and minimize safety, health, and environmental risks associated with our products. We strongly apply our company values of innovation and continual improvement to designing safe and environmentally sound products that meet regulatory requirements for specified uses as well as the principles of ESG. We are committed to providing timely and relevant technical and regulatory information about our products to our customers.

Product stewardship is an integral part of our Environmental, Social and Governance (ESG) program at KRONOS. For more information about ESG policies and programs at KRONOS, please go to www.kronosww.com/ESG.

This document provides general product safety and stewardship information applicable to our titanium dioxide products. Grade-specific stewardship information is available to current customers (and prospective customers under a non-disclosure agreement) by email request to productstewardship@kronosww.com.

Business Integrity and Governance

As stated in our Code of Business Conduct and Ethics, KRONOS has a zero-tolerance policy toward bribery and corruption and demonstrates honesty and fairness in all its business activities. The offering or acceptance of kickbacks, bribes, and other illegal payments subverts the very essence of competition and erodes the moral fiber of those involved. Such activities are not condoned or tolerated. For more information about our corporate governance policies, please go to www.kronosww.com/ESG/governance.

Supplier Code of Conduct

KRONOS respects the rights and dignity of all persons with whom it deals. In particular, KRONOS is committed to aligning its operations and strategies with the universally accepted principles followed by the UN Global Compact, the provisions of the UN Universal Declaration of Human Rights, and the Conventions of the International Labor Organization (ILO) with respect to:

- Supporting the implementation of human rights
- Prohibition and elimination of child labor
- Freedom of employment and association
- Promotion of equal opportunity and treatment in employment and occupation
- Safe and healthy working conditions
- Payment of living wages and regular employment entitlements
- Non-excessive working hours
- Improving environmental protection and
- Fighting against corruption.

KRONOS has defined these and commitments and addressed other key ESG areas in its Supplier Code of Conduct available at www.kronosww.com/ethics.

ESG Rating

Since 2014, KRONOS has been rated by the independent rating firm EcoVadis. This rating system focuses on corporate responsibility and ESG in the supply chain and includes product stewardship categories. KRONOS has also agreed to be rated by Integrity Next. These ratings are intended to help KRONOS internally and externally benchmark to identify areas for continual improvement. These ratings also support our customers in their own compliance and ESG efforts. More information can be found at www.kronosww.com/sustainable-procurement-supply-chain-due-diligence.

Participation in industry groups

To augment our internal knowledge and programs, KRONOS is an active participant in several key industry groups that address product stewardship topics common to the titanium dioxide (TiO2) industry, including new and emerging regulations. These groups conduct analytical work and perform large science and other studies for regulatory purposes (i.e., REACH), address new and emerging technical questions and supplement the already robust body of science supporting the safety of TiO2 in its many applications. KRONOS is a member of the Titanium Dioxide Stewardship Council (a subgroup of the American Chemistry Council or ACC), the Titanium Dioxide Manufacturers Association (a subgroup of the European Chemical Industry Council or CEFIC), the Titanium Dioxide Industry Consortium, and the Chemical Industry Association of Canada.

Compendium of General Product Stewardship Information

Conflict Minerals

During the manufacturing process for KRONOS titanium dioxide, neither "Conflict Minerals" (columbite-tantilite [tantalum], cassiterite [tin], gold, wolframite [tungsten], or their derivatives) nor “Extended Conflict Minerals” (cobalt, mica [sheet silicate mineral]) from the Democratic Republic of Congo, the African Great Lakes Region, or other adjoining countries are used.

EU REACH

KRONOS titanium dioxide complies with Regulation (EC) No. 1907/2006 (REACH) and has been registered as required. KRONOS titanium dioxide is not a substance of very high concern (SVHC) and does not contain any SVHC listed in the June 2024 version of the candidate list. It does not contain any substances subject to authorization (per Annex XIV) or restriction (per Annex XVII) of the REACH regulation.

TSCA

Section 8(b) of the Toxic Substance Control Act (TSCA) requires that the US EPA compile and maintain an inventory of active chemical substances placed into commerce in the US (“TSCA Inventory”). KRONOS verifies that titanium dioxide is listed as an “active substance” in the February 2022 publication of the TSCA inventory. KRONOS titanium dioxide does not contain persistent, bioaccumulative and toxic (PBT) substances subject to restrictions regarding Section 6(h) of the TSCA (March 2021).

Emerging Chemical Substance Registrations

KRONOS is closely monitoring, taking steps and in some cases has already completed pre-registration in other government jurisdictions, which are in the process of enacting or implementing chemical registration requirements. Examples of other such emerging registrations are UK REACH, Turkey REACH, and Korea REACH. Please contact productstewardship@kronosww.com for questions about substance registrations in other jurisdictions.

California Proposition 65

California lists titanium dioxide (airborne, unbound particles of respirable size) as a carcinogen under Proposition 65. That listing requires workplace warning statements and hygiene practices in certain exposure situations and product warning statements in certain very limited cases. Appropriate industrial hygiene practices should be used for workers who work with airborne, unbound titanium dioxide in the manufacture of products such as coatings, plastics, and paper, which contain titanium dioxide as an ingredient.

Classification of Specific Titanium Dioxide per the European Commission CLP Regulation 2020/217, Annex VI

KRONOS' powder grades have been tested using the analytical method EN15051-2 to determine if they meet the threshold for Category 2 classification under the EU CLP Regulation. Results show that KRONOS titanium dioxide products do not meet the "1% or more of particles with aerodynamic diameter of ≤ 10 µm" criteria set forth in the Regulation and are therefore not classified under the Regulation. Our Safety Data Sheets and Product Stewardship Documents include aerodynamic diameter information by product grade. On November 23, 2022 the Court of Justice of the European Union annulled the classification of titanium dioxide in its entirety because it was not based on reliable and acceptable studies and because titanium dioxide does not have the intrinsic property to cause cancer.

Particle Size – Pigment Products

KRONOS manufactures its pigmentary titanium dioxide to achieve a consistent particle size range but does not intentionally manufacture these products using nanotechnology or to achieve nanomaterial properties or particle size. Therefore, our pigment grades do not meet the accepted definitions of nanomaterial. In fact, a particle size greater than 100 nanometers (nm) is necessary in pigment products to achieve desired properties, including opacity. The manufacturing process results in a primary particle size range following a normal or Gaussian distribution curve, where it can be assumed that a small percentage of primary particles are <100 nm (i.e., nanoparticles in terms of ISO/TS 80004).

KRONOS pigmentary titanium dioxide contains less than 50 percent of particles in the number size distribution where one or more external dimensions is between 1 nm and 100 nm. Therefore, KRONOS pigmentary products are not nanomaterials according to the definition given in European Commission Recommendation 2022/C 229/01 dated June 10, 2022.

Also, KRONOS pigmentary titanium dioxide does not fall within the scope of the French Decree No. 2012-232 dated February 17, 2012, the Belgian Royal Decree C-2014/24329 dated May 27, 2014, or the Canadian Section 71 Notice dated July 25, 2015, requiring the declaration of nanomaterials.

Dust Explosion Hazard

KRONOS titanium dioxide is an inert inorganic chemical substance. It is neither flammable nor explosive and cannot be assigned to any dust explosion class as defined under national and international standards on dust explosions.

European Printing Ink Association (EuPIA) Exclusion List

KRONOS titanium dioxide complies with the EuPIA Exclusion Policy for Printing Inks and Related Products, 5th Edition, dated June 2023.

Global Automotive Declarable Substance List (GADSL)

KRONOS titanium dioxide does not contain any prohibited and declarable substances above the threshold levels listed in the "Global Automotive Declarable Substances List," Version 1.0, issued February 1, 2024. Any impurities in the titanium dioxide have not been intentionally added but are originating from the raw material used.

Microplastics

Annex XVII to REACH Regulation (EC) No 1907/2006 was amended by Commission Regulation (EU) 2023/2055 to add synthetic polymer microparticles. Titanium dioxide is widely used as an opacifier in paints, plastics, paper, cosmetics etc. and is frequently surface treated with organic substances to improve its chemical compatibility within the application matrix. KRONOS titanium dioxide particles that are organically surface treated do not fall under the definition of synthetic polymer microparticles.

WEEE/RoHS

KRONOS, as the manufacturer of the raw material titanium dioxide (CAS No. 13463-67-7), confirms that the requirements of the Directives 2012/19/EU (WEEE) "… on waste electrical and electronic equipment," and 2011/65/EU (RoHS) "… on the restriction of the use of certain hazardous substances in electrical and electronic equipment," and Commission Delegated Directive (EU) 2015/863, amending Annex II to Directive 2011/65/EU, do not apply to KRONOS titanium dioxide pigments (all types).

Nevertheless, KRONOS confirms that KRONOS' titanium dioxide pigments (all types) comply with the maximum concentration values for the RoHS relevant substances as stated in Annex II of the Directive (EU) 2015/863.

KRONOS Worldwide, Inc.

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