

1 June 2015

Subject: Ashland response to questions on compliance towards Turkish Chemical regulations.

Dear valued Customer,

We received your inquiry regarding whether products from Ashland Inc. and its subsidiaries, sold to the Turkish market, are compliant with Turkish Chemical Regulations as described below;

- By-law On The Safety Data Sheets For Hazardous Substances And Mixtures (13.12.2014 /29204)(GBF)
- By-law on Inventory and Control of Chemicals (26.12.2008/ 27092)(CICR)
- By-law On The Classification, Labelling And Packaging Of Substances And Mixtures (11.12.2013/28848)(SEA)
- KKDIK - Turkish REACH Regulation (Draft)

We are pleased to confirm that our products sold to the Turkish market comply with these regulations, as to ensure that the supply of goods to our customers is not disrupted.

As you are aware GBF, CICR, SEA and KKDIK regulations require the manufacturers/importers or the downstream users to meet certain obligations;

- CICR
 - *Notification:* Imported substance, on its own or in a preparation, in quantities exceeding 1 tonne/1,000 tonnes per year shall be notified.
- SEA
 - *Labelling & Packaging:* substances classified as hazardous according to the CLP/GHS, shall be Labelled in Turkish and packaged in accordance to the regulation. Deadlines are as below;
 - 1st of June 2015 for substances
 - 1st of June 2016 for mixtures
 - *Notification:* substances classified as hazardous and imported into Turkey either on their own or in a mixture above the concentration limits, results in the classification of the mixture as hazardous shall be notified.
- KKDIK
 - *Registration:* substances manufactured or imported in quantities of one tonne or more per year per manufacturer or importer, unless they are exempted from the scope of registration, shall be registered.
- GBF
 - *Language and Format:* SDS shall be provided in Turkish and in the required format.
 - *Authorization:* Turkish SDS shall be authorized by a Turkish certified expert.
 - *Notification:* Authorized Turkish SDS shall be submitted to the Ministry.

To avoid our customers importing Ashland products into Turkey having to notify / register substances involved, Ashland Inc. has assigned "**MERKEZİ ABD BULUNAN ISP INTERNATIONAL CORP. TÜRKİYE ŞUBESİ**" as their Only Representative (OR) according to the regulations SEA, CICR and KKDIK. Following this appointment, our OR has notified / registered substances involved. Therefore, customers are relieved from their obligations as an importer and become a downstream user of Ashland Inc. under these regulations in Turkey.

Substance(s) in our product portfolio have been notified where applicable under the CICR, SEA regulations and the notifications are kept updated. We anticipate, following the publication, registrations will also be completed under KKDIK, where applicable.

IMPORTANT DISCLAIMER: While it is our intention to Register those substances sold to the Turkish market, we cannot guarantee or absolutely commit to future Registration. Ashland's product portfolio is subject to continual evaluation and optimization based on market and customer needs, including market size and profitability. Ashland is dependent on what information is received from its suppliers about the presence of SVHCs contained in purchased materials that compose Ashland's products. Ashland retains the right to discontinue any product, and no rights can be derived from this publication and Ashland disclaims any liability for any errors or omissions.

Hazard classifications, Safety Data Sheets (SDS) and labels for Ashland products meeting the definition of a "substance" are compliant with both the SEA and GBF Regulations by 1st of June 2015. Ultimately by 1st of June 2016, hazard classifications, Safety Data Sheets (SDS) and labels for Ashland products meeting the definition of a "mixture" will also undergo transition to the new formatting and hazard symbols/ phrases as dictated by both the SEA and GBF Regulations. During this transition period, SEA hazard classifications for the components in mixtures will be communicated on the SDS in addition to the existing hazard classifications (according to "Tehlikeli Maddeler ve Müstahzarlara İlişkin Güvenlik Bilgi Formlarının Hazırlanması ve Dağıtılması Hakkında Yönetmelik" 26.12.2008/27092).

If you have questions regarding any REACH-related subject, please contact us via your Ashland representative or send us an e-mail at REACH@ashland.com.

Kind regards,



Sandor Zuurendonk
Manager – REACH
Ashland

www.ashland.com/commitments/REACH