



ALDO GROUP RSL

December 2020

RESTRICTED SUBSTANCE LIST (RSL)

The ALDO Group's Restricted Substance List is derived from REACH, Consumer Product Safety Improvement Act, Proposition 65 and Canada Consumer Product Safety Act regulations. Suppliers must ensure that all accessible components of products supplied to all ALDO Group divisions comply to the chemical limits outlined in the table below.

The compounds of concern are listed in alphabetical order and are of equal importance. Suppliers must ensure that products manufactured for the ALDO Group are within acceptable limits for all listed compounds.

Key definitions:

Accessible components: Any component of a product that could be touched by a person during reasonably foreseeable use.

PPM = Parts per million = mg/kg

ALDO Group RSL - Allowable Limits and Materials Matrix

Substance	CAS#		Maximum Allowable Limit	Function and Presence	Legislation	Test Method	Polymer, Plastics, Rubber & Other	Textiles & Fabrics (Natural Fibers)	Textiles & Fabrics (Synthetic & Blend)	Real Leather	Ink, Paint, Prints or Coatings	Metal Parts	Preparations
Alkylphenols (AP & Alkylphenol Ethoxylates (APEO))	NPEO - Nonylphenol Ethoxylate	Various	50 ppm - finished product 1000 ppm - preparations	Used as wetting agents in textiles processing. Considered an aquatic pollutant and can disrupt hormone-regulating systems.	EU REACH Regulation (EC) No. 1907/2006 Annex XVII (processing) and focus of NGO campaigns	Textiles: ISO 18254-1:2016 Leather : ISO 18218-1:2015 Plastic,paint, powder: In house method		*	*	*	*		*
	OPEO - Octylohenol Ethoxylate	Various											
	NP - Nonylohenol	Various											
	OP - Octylphenol	Various											
Asbestos	Actinolite	77536-66-4	Prohibited	Used in the production of cloths and garments for its resistance to heat and corrosive elements.	European Union REACH Regulation (EC) No. 1907/2006 Annex XVII	Microscopic examination		*	*				
	Amosite	12172-73-5											
	Anthrophyllite	77536-67-5											
	Chrysotile	12001-29-5											
	Crocidolite	12001-28-4											
Tremolite	77536-68-6												
Azo Dyes (24 carcinogenic aromatic amines)	p-Chloroaniline	106-47-8	Children's Product: 20 ppm per each Azo Dye Other Product: 30 ppm per each Azo Dye	Used for dyeing textiles and leather. May decompose under certain conditions to produce carcinogenic as aromatic amines.	EU REACH Regulation (EC) No. 1907/2006 Annex XVII GB18401, GB20400-2006	Textiles (natural and synthetic): BS EN ISO 14362-1:2017 and BS EN ISO 14362-3:2017 for 4 aminoabenzene Real Leather: BS EN ISO 17234-1:2010 and BS EN ISO 17234-2:2011 for 4 aminoabenzene		*	*	*	*		
	o-Toluidine	95-53-4											
	o-Anisidine	90-04-0											
	o-Aminoazotoluene	97-56-3											
	Benzidine	92-87-5											
	p-Cresidine	120-71-8											
	2,4-Toluenediamine	95-80-7											
	4-Chloro-o-toluidine	95-69-2											
	4-Aminodiphenyl	92-67-1											
	4-Aminoazobenzene	60-09-3											
	4,4'-Thiodianiline	139-65-1											
4,4'-Oxydianiline	101-80-4												

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	3,3'-Dimethyl-4,4'-diamino-diphenylmethane	838-88-0											
	4,4'-Diamino-diphenylmethane	101-77-9											
	4,4'-Methylene-bis-(2-chloroaniline)	101-14-4											
	3,3'-Dimethylbenzidine	119-93-7											
	3,3'-Dimethoxybenzidine	119-90-4											
	3,3'-Dichlorobenzidine	91-94-1											
	2-Naphthylamine	91-59-8											
	2-Animo-4-Nitrotoluene	99-55-8											
	2,6-Xylidine	87-62-7											
	2,4'-Diaminoanisole	615-05-4											
	2,4,5-Trimethylaniline	137-17-7											
	2,4 Xylidine	95-68-1											
Bisphenol - A	Bisphenol - A (BPA)	80-05-7	1 ppm	Used in the production of epoxy resins, polycarbonate plastics, flame retardants and PVC.	EU Regulations; US States Legislations Prop 65	LC-MS	*			*			
Chlorinated Phenols	Pentachlorophenol (PCP)	87-86-5	PCP: Prohibited Children's Product: 0.05 ppm Other Product: 0.5 ppm	Applied directly on textiles, leather and wood to prevent mold. Toxic & cancer-inducing agent.	EU REACH Regulation (EC) No. 1907/2006 Annex XVII EU POPs	Textile / Leather: LFGB § 64 BVL B82.02.8 Leather: DIN EN ISO 17070:2012 Polyester / polyester-blend / printed fabric: Modified § 64		*	*	*			*
	Tetrachlorophenol (TeCP)	25167-83-3											

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						LFGB BVL B82.02.8 with alkaline digestion Wood: BS EN 717-3:1996							
Chromium VI		18540-29-9	3 ppm	By-product of leather tanning process. Strong oxidant and carcinogenic	EU REACH Regulation (EC) No. 1907/2006 Annex XVII and Prop65	EN ISO 17075-1:2017 with aging Confirmation by EN ISO 17075-2: 2017 with aging Aging condition: ISO 10195 method A2				*			
DMFA	Dimethyl Formamide	68-12-2	500 ppm	Solvent used in plastics, rubber, and polyurethane (PU coating).	EU REACH Regulation (EC) No 1907/2006 Annex XVII	DIN CEN ISO/TS 16189:2013	*				*		
DMFU	Dimethyl Fumarate	624-49-7	Prohibited (0.1 ppm)	Mold retardant properties. Volatile compound, irritating and harmful on skin & respiratory track via contact or inhalation.	EU REACH Regulation (EC) No. 1907/2006 Annex XVII	CEN ISO/TS 16186		*	*	*			
Disperse Dyes Allergenic and Carcinogenic	Disperse blue 1	2475-45-8	50 ppm (per each)	Dying of synthetic materials. Allergenic (20) and/or carcinogenic (9). Absorbed through the skin with prolonged direct contact.	EU REACH Regulation (EC) No. 1907/2006 Annex XVII	DIN54231 TLC Method (for synthetic textile in direct skin contact)							
	Disperse blue 3	2475-46-9											
	Disperse blue 7	3179-90-6											
	Disperse blue 26	3860-63-7											
	Disperse blue 35	12222-75-2											
	Disperse blue 102	12222-97-8											
	Disperse blue 106	12223-01-7											

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Flame Retardants	Tris (2-chloroethyl) phosphate (TCEP)	115-96-8	Prohibited	Impairment of the immune system, hypothyroidism, memory loss and joint stiffness	- EU REACH Regulation (EC) No. 1907/2006 Annex XVII, EN POP's Regulation (EC) No. 850/2004, amended by 757/2010 (for non-EEE) and - Prop65 - Persistent Organic Pollutants Regulation (EC) No 850/2004, as amended by Regulation (EU) No 757/2010 (for non-EEE)	GC-MS/GC-ECD/LC-MS	*	*	*	*			
	Polybrominated biphenyls (PBBs)	59536-65-1											
	Penta-bromodiphenyl ether (pentaBDE)	32534-81-9											
	Tris (2,3-dibromopropyl) phosphate (TRIS)	126-72-7											
	Tris (1-aziridinyl)-phosphate oxide (TEPA)	545-55-1											
	Octa-bromodiphenyl ether (octaBDE)	32536-52-0	0.1% by weight										
	Deca-bromodiphenyl ether (decaBDE)	1163-19-5											
	Tris (1,3-dochloro-2-propyl) phosphate (TDCPP)	13674-87-8	10mg/kg										
	Tetrabromodiphenyl ether (Tetra BDE)	5436-43-1											
	Pentabromodiphenyl ether (Penta BDE)	60348-60-9											
	Hexabromodiphenyl ether (Hexa BDE)	207122-15-4											
	Heptabromodiphenyl ether (Hepta BDE)	189084-67-1											
Hexabromocyclododecane (HBCDD)	25637-99-4	100 mg/kg											
Formaldehyde		50-00-0	Babies Products (< 36 months): 20 mg/kg Others: 75 mg/kg	Cross-linking agent, easy-care finish, prevents shrinkage with crease-resistant properties. Irritating to respiratory track	EU REACH Regulation (EC) No. 1907/2006 Annex XVII and China	Textile: EN ISO 14184-1:2011 Real Leather: EN ISO 17226-2:2008		*	*	*	*		*

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Heavy Metals	Antimony (Sb) In metal jewelry parts or other product hardware	7440-36-0	60 ppm in metal jewelry parts or other product hardware	Skin irritant, hormone disrupting and carcinogenic.	Metal specific EU directives and Prop65	Metal: BS EN71-3:2013					*	*	
	Arsenic (As) In metal jewelry parts or other product hardware	7440-38-2	25 ppm in metal jewelry parts or other product hardware	Skin irritant, hormone disrupting and carcinogenic. May cause cardiovascular disease and diabetes.	Metal specific EU directives and Prop65	Metal: BS EN71-3:2013					*	*	
	Barium (Ba)	7440-39-3	1000 ppm in metal jewelry parts or other product hardware	Skin irritant, hormone disrupting and carcinogenic.	Metal specific EU directives and Prop65	Metal: BS EN71-3:2013					*	*	
	Cadmium (Cd)	7740-43-9	Children's Product: 40 ppm	Carcinogen and toxic. Exposure may result in development and hormonal deficiencies. Used as dye and stabilizer for plastic materials.	EU REACH Regulation (EC) No. 1907/2006 Annex XVII and Prop65	Metal: CPSC-CH-E1001-08.3 Non-metal: CPSC-CH-E1002-08.3 Surface coating: CPSC-CH-E1003-09.1	*	* Printed	* Printed			*	*
All product, except metal jewelry parts or hardware: 100 ppm			For all product except metal jewelry parts or hardware: EN 16711-1 BS EN 17072-2:2011			For metal jewelry parts							

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			hardware: 75 ppm			or hardware: BS EN71-3:2013							
	Chromium (Cr)	7440-47-3	60 ppm in metal jewelry parts or other product hardware	Exposure causes respiratory distress and reproductive problems	Metal specific EU directives and Prop65	BS EN71-3:2013					*	*	
	Chromium VI	18540-29-9	Leather: 3 ppm	By-product of leather tanning process. Strong oxidant and carcinogenic	EU REACH Regulation (EC) No. 1907/2006 Annex XVII and Prop65	Leather: EN ISO 17075-1:2017 with aging Confirmation by EN ISO 17075-2:2017 with aging Aging condition: ISO 10195 method A2				*			
	Lead (Pb)*	7439-92-1	All Jewelries and All Childrens products: 90 ppm – ALL COMPONENTS (including Paint or surface	Constituent of dyes and pigments. Bio-cumulative and affect the nervous system. Classified as carcinogen. Impaired, irreversible brain development.	CPSIA, Prop65 and EU REACH Regulation (EC) No. 1907/2006 Annex XVII	Non-metal: CPSC CH-E1002 08.3; Metal: CPSC CH-E1001 08.3 Paint and surface	*	*	*	*	*	*	*

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			coatings and all substrate) All products, except Jewelries and children's product: - 90 ppm - Paint or surface coatings - 200 ppm - Plastics -300 ppm - other materials			coatings: CPSC-CH-E1003-09.1 ASTM F2853-10 ICP analysis-total digestion							
	Mercury (Hg)	7439-97-6	Children's Product: 10 ppm	Highly toxic to the nervous system and damage kidneys.	Metal specific EU directives and Prop65	In house method Canada Consumer Product Safety Act					*	*	
			90 ppm in metal jewelry parts or other product hardware			BS EN71-3:2013							
	Nickel Release	7440-02-0	0.2 µg/cm2/week - piercing the skin 0.5 µg/cm2/week - prolonged skin contact	Found in metal alloys. Highly allergenic, causing skin irritation	EU REACH Regulation (EC) No. 1907/2006 Annex XVII	BS EN 12472:2005 + A1:2009 BS EN 1811:2011 + A1:2015						*	

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	Selenium (Se)	7782-49-2	500 ppm in metal jewelry parts or other product hardware	Skin irritant, hormone disrupting and carcinogenic.	Metal specific EU directives and Prop65					*	*	
Extractable Heavy Metal	Arsenic (As) Lead (Pb) Cadmium (Cd) Chromium VI (Cr VI)		1 ppm (each)	can be used in preservatives, pesticides, and defoliants for cotton, synthetic fibers, paints, inks, trims, and plastics.	EU REACH Regulation (EC) No. 1907/2006 Annex XVII	Textile: EN 16711-2 *	*	*		*		
Organostannic Compounds (Organotins)	Tributyltin (TBT)	Multiple	Infant Products (< 36 months): Tri-substituted organostannic compounds such as TPhT/TCyT/TOT/TPT/TMT: 0.1% by weight of tin DOT: 0.1% by weight of tin TBT: 0.5 mg/kg DBT: 1.0 mg/kg	Catalyst and heat stabilizer for polymeric materials (PVC, polyurethane), Absorbed through the skin causing productive disorders and damage to the nervous system. Toxic for the environment.	EU REACH Regulation (EC) No. 1907/2006 Annex XVII and Prop65	CEN ISO TS 16179:2012	*	*	*	*	*	*
	Triphenyltin (TPhT)	Multiple										
	Tricyclohexyltin (TCyT)	Multiple										
	Trioctyltin (TOT)	Multiple										
	Tripropyltin (TPT)	Multiple										
	Trimethyltin (TMT)	Multiple										
	Dibutyltin (DBT)	Multiple										
	Diocetyl tin (DOT)	Multiple	Others: Tri-substituted organostannic compounds such as TPhT/TCyT/TOT/TPT/TMT: 0.1% by weight of tin DBT: 0.1% by weight of tin DOT: 0.1% by weight of tin TBT: 1.0 mg/kg									

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Perfluorooctane Sulfonate and Perfluorooctanoic Acid	Perfluorooctane Sulfonate (PFOS)	2795-39-3	Children's Product: Prohibited Other Product: 1 µg/m ² where water or oil repellent coating/treatment has been applied; 10 mg/kg for preparations; 1000 mg/kg for plastic materials PFOA: 0.025 mg/kg	Provides water and oil resistant properties to textiles. Bio-cumulative and toxic.	EN POP's Regulation (EC) No. 850/2004 Annex 1 and focus of NGO campaigns	PD CEN/TS 15968:2010 Leather: ISO 23702-1-2018		Coated only *	Coated only *	Coated only *			*
	Perfluorooctanoic Acid (PFOA)	3825-26-1											
PH Value			Textile: In contact with skin: 4.0 -7.5 Without skin contact: 4.0 - 9.0 Leather: With or without contact: 3.5 - 7.5	pH value is a characteristic number, ranging from pH 1 to pH 14, which indirectly shows the content of acidic or alkaline substances in a product.		Textile: ISO 3071 Leather: ISO 4045		*	*	*			
Phthalates**	DEHP (Di-2-ethylhexyl phthalate)	117-81-7	1000 ppm (sum of phthalates)	Plasticizer used to soften PVC, PU and printing inks. Not bonded permanently in the material and release over the years. Bio-cumulative and cause productive disorders, Toxic to the environment.	EU REACH Regulation (EC) No. 1907/2006 Annex XVII, CPSIA and Prop65	CPSC-CH- C1001-09.4	*						*
	DBP (Dibutyl phthalate)	84-74-2											
	BBP (Benzyl butyl phthalate)	85-68-7											
	DINP (Diisononyl phthalate)	28553-12-0											
	DNOP (Di-n-octyl phthalate)	117-84-0											
	DIDP (Diisododecyl phthalate)	26761-40-0											

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	DNHP (Di-n-hexyl phthalate) / DHEXP)	84-75-3											
	DIBP (Diisobutyl phthalate)	84-69-5											
	DIHP (Di-isoheptyl phthalate)	71888-89-6											
	DHNUP (Di-heptyl, nonyl, undecyl, phthalate)	68515-42-4											
	DMEP (Bis(2-methoxyethyl) phthalate)	117-82-8											
	DIPP (Di-iso-pentyl phthalate)	605-50-5											
	DPP (Dipentyl phthalate) / DPENP	131-18-0											
	1,2-Benzenedicarboxylic acid, dipentylster, branched, linear	84777-06-0											
	DEP (Diethylphthalate)	84-66-2											
	DCHP (Dicyclohexyl phthalate)	84-61-7											
Polycyclic Aromatic Hydrocarbons (PAH) (8)	Benzo(a)pyrene	50-32-8	Children's Product: 0.5 ppm (per each)	Found in fossil fuels. Used to make dyes and found in plastics as contaminants and are carcinogenic.	EU REACH Regulation (EC) No. 1907/2006 Annex XVII entry 50 (8) and entry 72	AfPS GS 2014:01 PAK GC-MS Analysis	*						
	Benzo(e)pyrene	192-97-2											
	Benzo(a)anthracene	56-55-3	Other Product: 1 ppm (per each)										
	Benzo(b)flouranthene	205-99-2											
	Benzo(j)flouranthene	205-82-3											
	Benzo(k)flouranthene	207-08-9											
	Chrysen	218-01-9											
	Dibenzo(a,h)anthracene	53-70-3											
Short-Chain Chlorinated Paraffins (SCCP)	SCCP (C10-C13)	85535-84-8	Not detected	Used as flame retardant and plastisizers in plastics, metalwork and leather. Persistent organic pollutants and carcinogenic	EU POP's Regulation (EC) No. 850/2004 Annex 1	ISO 18219 GC-MS Analysis	*			*	*		

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Residual Volatile Organic Compounds (VOC)	Toluene	108-88-3	Toluene: 50 mg/kg	Solvents often used in paints/ink, glues, cleaning agents and shoe primer. Gives product strong unpleasant odour. Carcinogenic, toxic and an irritant	EU REACH Regulation (EC) No. 1907/2006 Annex XVII, Prop65 and China	GC-MS Analysis	*	*	*	*	*		*	
	Benzene	71-43-2	Benzene: 1 mg/kg											
	N,N-dimethylacetamide (DMAC)	127-19-5	Textile articles in skin contact / footwear: 3000 mg/kg											
	N-methyl-2-pyrrolidone (NMP)	872-50-4	Naphthalene: 10 mg/kg											
	Naphthalene	91-20-3												
Chlorotoluenes	$\alpha,\alpha,\alpha,4$ -tetrachlorotoluene	5216-25-1	1 mg/kg (each)	can be used as carriers in the dyeing process of polyester or wool/ polyester fibers.	EU REACH Regulation (EC) No. 1907/2006 Annex XVII	EN 17137:2018			*					
	α,α,α -trichlorotoluene	98-07-7												
	α -chlorotoluene	100-44-7												
Arylamine salts	4-chloro-o-toluidinium chloride	3165-93-3	30 mg/kg	Used for dyeing textiles. May decompose under certain conditions to produce carcinogenic as aromatic amines.	EU REACH Regulation (EC) No. 1907/2006 Annex XVII	ISO 14362-1:2017		*	*		*			
	2-Naphthylammoniumacetate	553-00-4	30 mg/kg											
	4-methoxy-m-phenylene diammonium sulphate; 2,4-diaminoaniline sulphate	39156-41-7	30 mg/kg											
	2,4,5-trimethylaniline hydrochloride	21436-97-5	30 mg/kg											
Quinoline		91-22-5	50 mg/kg	Found as an impurity in polyester and some dyestuffs.	EU REACH Regulation (EC) No. 1907/2006 Annex XVII	Solvent extraction		*	*		*	(on textile)		
Cellulose Nitrate (apply to Sunglass product only)		9004-70-0	Shall have no spectacle frames that, in whole or in part, are made of or contain cellulose nitrate.	A mixture of nitric esters of cellulose, and a highly flammable compound that is the main ingredient of modern gunpowder and is also employed in certain plastics, lacquers and paints.	Canada Consumer Product Safety Act	With reference to Canada Health Product Safety Bureau, Reference Manual Book 5 – Laboratory Policies and Procedures, Part B: Test Methods Section, Method C-	*				*			

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					17:2003. Analysis was performed by (FTIR)							

* All materials, including Glass components, must comply with ALDO Lead requirement.

** ALDO package price includes:

o Children's products: 10 Phthalates: BBP, DBP, DEHP, DINP, DIDP, DNOP, DCHP, DIBP, DNHP/DHEXP, DPP/DPENP = 0.1% max Total

o Adult Products: 8 Phthalates: BBP, DBP, DEHP, DINP, DIDP, DNOP, DIBP, DNHP/DHEXP = 0.1% max Total