

Global Market Expansion Services for Safety, Environment, Quality, and Regulatory Affairs (SEQRA)





Market Expansion Services: dedicated to growing business

We help companies to grow their business in new and existing markets. We expand their access to knowledge, their sourcing base, their revenue opportunities, and their market shares. Providing business partners with a comprehensive package of services to reach their individual goals is what we call Market Expansion Services.

Your strategic partner

DKSH is a Swiss company and the world leader in Market Expansion Services with a focus on Asia. Our four Business Units – Consumer Goods, Healthcare, Performance Materials, and Technology – operate worldwide through an extensive network of experts. We offer a comprehensive range of services along the entire value chain: from sourcing, marketing and sales to distribution and after-sales services. Along with this we offer long-standing relationships, local knowledge, and on-the-ground logistics. As a strategic partner, we safeguard the business of our clients and customers while always sharing our unique market insights. It is our aim to be a trusted link between suppliers and customers, taking care of the products of our business partners as if they were our own.

SEQRA – Safety, Environment, Quality, and Regulatory Affairs

As part of the DKSH Business Unit Performance Materials the DKSH SEQRA experts are an integral part of the DKSH Market Expansion Services package, handling compliance, registration, and documentation for customers and suppliers. Part of this is our special competency center for the European REACH regulation which, along with our many other SEQRA competence centers all around the world, provides effective support for our business partners.



The best of both worlds – yours and ours

Experience and networks

DKSH has done business in and with Asia for more than 140 years. We are truly at home in Asia, where we have become an integral part of many local business environments. And we are no strangers to the rest of the world either: DKSH operates in 35 countries, with 540 business locations in Asia and 20 in Europe and the Americas, and employing 22,000 specialized staff from 50 nations.

Integrating diverse services

We bridge the markets of Europe, Asia, and the Americas, and have the ability to adapt to the businesses we serve in any local market. The diversity of industries

DKSH is involved in is only matched by the range of services we perform: from sourcing raw materials to setting up and running flagship stores for luxury consumer brands, and from feasibility studies and product development to the many facets of marketing.

Our more than 170 state-of-the-art distribution centers work with the largest SAP application in Asia to help execute, track, and analyze hundreds of thousands of business transactions every day. The detailed information we gain from this process contributes to the expert knowledge that we use to provide strategic advice to our business partners. Offering all these diverse services from a single source is

another important aspect of what we at DKSH call Market Expansion Services.

Experts and entrepreneurs

In order to provide deep industry expertise for these many fields of business, we are not only organized into four Business Units, but are further specialized into Business Lines and Product Groups, maintaining the hands-on and entrepreneurial style of business our company was founded on. DKSH provides a balance between specialist knowledge of our partners' industries and a practical business approach that efficiently gets things done.

Responsibility and care: SEQRA – Safety, Environment, Quality, and Regulatory Affairs

With global business comes global responsibility. Therefore, DKSH's Business Unit Performance Materials has formed an independent team of dedicated specialists that assures safety and compliance and supports our business partners in ever more complex regulatory matters.

Experts and specialists meeting your business needs

Safety, the protection of the environment, as well as quality and regulatory compliance are our top priorities at DKSH. Our dedicated global SEQRA team of experts delivers professional risk assessments and guarantees compliance with safety regulations for manufacturing, transport, warehousing, and

handling of any chemical compound. We set standards for global safety concepts with our specialized safety officers while supporting our business partners in all compliance matters as well as handling product registration along with any and all required documentation. We also have the expertise to conduct supplier auditing and certification and possess all necessary in-house quality control capabilities.

The approach

We employ highly qualified experts for SEQRA matters of all levels, setting a policy, clear rules, and standards to enhance reliability and compliance. We implement a global reporting system to improve safety,

quality, and regulatory compliance. We are resourceful to manage and anticipate current and future costs and investments related to all SEQRA activities.

Our tools

In order to achieve all this we work with state-of-art IT solutions, that are tailor-made to fit the needs of our business partners. Our three Specialist Lines SHE (Safety, Health, and Environment), QA (Quality Assurance), and REG (Registrations) are staffed with specialists on all levels, with each Specialist Line acting on a global, regional, and local level.

Locations in the Americas		Locations in Asia Pacific	
Chile	1	Australia	6
USA	1	Brunei	2
		Cambodia	4
Locations in Europe		China	61
Denmark	1	Hong Kong	33
France	1	India	8
Germany	2	Indonesia	2
Great Britain	1	Japan	13
Italy	1	Korea	34
Netherlands	1	Laos	2
Norway	1	Malaysia	67
Poland	1	Micronesia	7
Spain	1	Myanmar	9
Switzerland	2	New Zealand	2
		Philippines	3
		Singapore	3
		Taiwan	40
		Thailand	216
		Vietnam	19

DKSH

Total Sales: CHF 8,600 million (2009)

22,000 specialized staff of 50 nationalities

Operations in 35 countries

540 business locations in Asia Pacific

20 business locations in Europe and the Americas

Network of more than 5,500 suppliers and over 550,000 customers

Over 170 state-of-the-art distribution centers

Largest SAP application in Asia

Compliance Competence Center (C³)

Compliance Competence Center Zurich
Safety, Health, and Environment/Quality Assurance
Abbr. C³ Zurich (SHEQA)

Compliance Competence Center Lyon
European Regulatory Affairs
Abbr. C³ Lyon (ERA)

Compliance Competence Center Ho Chi Minh City
Quality Assurance Seafood
Abbr. C³ Ho Chi Minh City (QAS)

Compliance Competence Center Bangkok
Asian Regulatory Affairs
Abbr. C³ Bangkok (ARA)

Compliance Competence Center Manila
Quality Control Laboratory for Food and Beverage Industry
Abbr. C³ Manila (QCLFBI)

Compliance Competence Center Mumbai
Safety, Health, and Environment/Quality Assurance/Regulatory Affairs
Abbr. C³ Mumbai (SHEQAREG)

Compliance Competence Center Shanghai
Audit and Inspection
Abbr. C³ Shanghai (AI)

Our competencies

Our experts

Local experts, professional networking, and the cumulated expertise of our people provide a knowledge base that makes DKSH SEQRA an uncompromisingly reliable consulting partner. We assume responsibilities and act with a can-do attitude, building trust and relationships for long-lasting business success.

When in 2007 the new EU laws for registration, evaluation, authorization, and restriction of chemicals (called REACH) took effect, new strategies became necessary to deal with this legislation. As an answer to this challenge DKSH SEQRA put into place a team of specialized REACH experts, working from our newly established European Regulatory Affairs Compliance Competence Center in France. With efficient marketing and compliance strategies from our EU regulations experts DKSH turns this tough new legislation into a competitive advantage for our partners.

Safety, Health, Environment (SHE)

We commit – safety first

We at DKSH commit to conducting all aspects of our business with respect and care for people and the environment. That means we do not move, store, or handle any chemical product prior control, approval, and formal release. To achieve this we continuously improve our business workflow and execute our daily business with concern for safety, health, and environment. We participate actively in the scientifically valid development of regulations, laws, and standards on cost-effective environment, health, and safety as well as product safety, and security matters.

We work in a constructive way, find and recommend solutions in time and eliminate obstacles. DKSH professionals create

ideas, tools, and systems through cross-functional communication in the SEQRA organization. To increase safety awareness we continuously train and educate our employees.

We propose preventive and corrective actions and share knowledge how to avoid further risks. DKSH employs management systems consistent with Responsible Care, ISO, or any other appropriate international standard.

Quality Assurance (QA)

We stand for quality

We assure customer satisfaction by continuously improving our quality management system and processes. DKSH's SEQRA team aims to increase quality and documentation along the entire value chain for all our products, services, and processes. To achieve this we:

- Conduct gap assessments in preparation for annual quality management system audits
- Assess the level of quality of specific customer requirements
- Improve control of documents
- Perform internal and external audits
- Establish professional product specification, quality certificates, and audit reports
- Prepare and train for crisis and incident management
- Constantly develop and improve our Deviation Management System (DMS) with which we track and adjust problems
- Permanently develop and improve the SEQRA Request Tool (SRT) which is a website-based online tool where all services concerning regulatory and compliance can be requested
- Define concrete action plans to support addressing the quality needs of individual businesses

Quality is a key success factor for sustainable growth. Quality awareness is needed on all management levels and quality increase must be the goal for each action of daily work. We work hard to increase quality – systematic but flexible, persistent yet open-minded.

Registrations (REG)

We add economic value with registrations

We believe in registrations as long-term business investments. This is why we guarantee careful planning and clear strategies in order to comply with national and international regulatory guidelines and rules, delivering all necessary regulatory documents during the process. Our registrations team (REG) aims to shaping the regulatory environment. We aim to influence and drive regulatory policy from the earliest stage of the development for a new project to the life cycle management of existing businesses.

We help reduce business risk

In addition, the REG team acts as a think tank and consultant for our business partners, offering registration management and regulatory strategies, while closely monitoring major regulatory issues and developments, regionally and globally. Based on harmonized procedures, common tools, and specialized people, our REG team also controls regulatory-compliance risk exposure throughout the world. As the first priority, the REG team is devoted to the success of REACH implementation in Europe as well as specific chemical regulations in place or to come in all the markets DKSH is present.



Our SEQRA services

Substance volume tracking fully implemented

One necessary obligation under REACH is substance volume tracking (SVT) under SAP, per substance, legal entity, and calendar year. The REACH experts have already successfully implemented the SAP SVT. The REACH process is now fully SAP-integrated and standardized. In January 2009, we inaugurated the European Regulatory Affairs C³ (Compliance Competence Center) Lyon (ERA). It is responsible for all registrations throughout the different DKSH locations in Europe. Besides regulatory affairs C³ Lyon is a true selling argument for our sales organizations and thus hugely benefiting for our customers and suppliers.

DKSH REACH competency a competitive advantage

The REACH legislation has just started and there are still many challenges ahead. We need joint actions, both from regulatory affairs and the business side and a proactive way of dealing with those challenges. Critical factors will be business-driven decisions combined with regulatory expertise. However, the cumulated deep industry knowledge of our REACH experts and the leverage of our global DKSH networks have already proven to be a real competitive advantage for everyone affected by the legislation.

SEQRA services

With our new online SEQRA request tool (SRT) we offer a complete overview of our SEQRA-related services. Based on the DKSH website and the website of the Business Unit Performance Materials, business partners may request our SEQRA related services by filling out convenient contact forms covering:

SHE (Safety, Health, and Environment)

- Safety audits/inspections
- Classifications and labelling
- SDS (Safety Data Sheet)
- GHS support (Global Harmonized System)

QA (Quality Assurance)

- Quality audits
- Quality pre-audit
- Claim management

REG (Registrations)

- REACH services
- Regulatory strategies and implementation
- Registration management

The DKSH global website also features a new menu entitled "Regulatory and compliance" and all local DKSH websites are linked up with SEQRA services.

Global presence means local knowledge

DKSH has established SEQRA competence centers all around the world in order to leverage the cumulated global DKSH experience and put to best use the knowledge that exists in the countries and regions at hand. The DKSH SEQRA competence centers are located in:

Switzerland

Compliance Competence Center Zurich
Safety, Health, and Environment/
Quality Assurance
Abbr. C³ Zurich (SHEQA)

France

Compliance Competence Center Lyon
European Regulatory Affairs
Abbr. C³ Lyon (ERA)

India

Compliance Competence Center Mumbai
Safety, Health, and Environment/
Quality Assurance/Regulatory Affairs
Abbr. C³ Mumbai (SHEQAREG)

Vietnam

Compliance Competence Center
Ho Chi Minh City
Quality Assurance Seafood
Abbr. C³ Ho Chi Minh City (QAS)

China

Compliance Competence Center Shanghai
Audit and Inspection
Abbr. C³ Shanghai (AI)

Thailand

Compliance Competence Center Bangkok
Asian Regulatory Affairs
Abbr. C³ Bangkok (ARA)

Philippines

Compliance Competence Center Manila
Quality Control Laboratory for Food and
Beverage Industry
Abbr. C³ Manila (QCLFBI)



Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH)

REACH is a new European Chemicals Regulation on chemicals and their safe use. Nevertheless, it applies to coming into the region from all over the world – making the law a global compliance matter. The purpose of REACH is to increase knowledge about chemical substances marketed in the EU and their uses, and to ensure that they are properly managed.

REACH is the strongest set of regulations ever imposed on the chemical industry. It has changed the competitive environment of the chemical industry not only in the European Union, but in all parts of the global chemical supply chain. Producers of chemicals, importers, and downstream users must invest time and money, allocate resources, and build the necessary competencies to achieve full compliance with REACH.

DKSH task force coping with REACH

In order to deal with the implications of REACH legislation DKSH has set up a special task force and established our very own European Regulatory Affairs Compliance Competence Center (C³ Lyon). As a professional REACH organization we take care of submission of registration packages, support non-EU companies through our comprehensive importer or representative service. We have also set up five legal entities in Europe for a choice of sales and registration strategies and offer legal and regulatory support and expert consulting.

Full service and tailor-made strategies

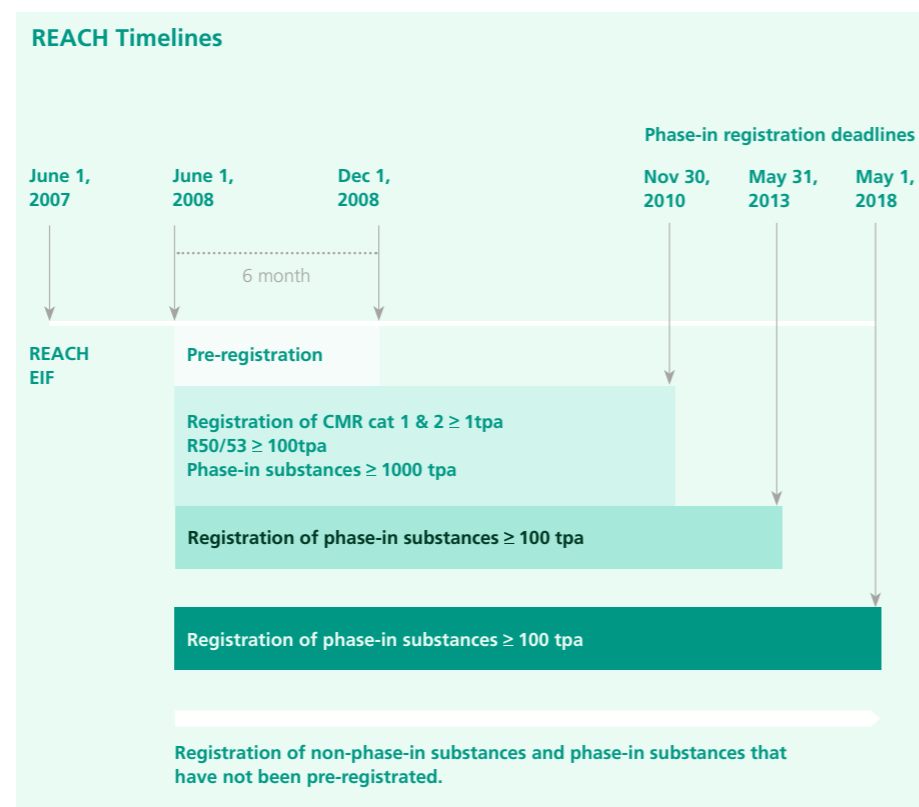
With our solid regulatory experience of markets in Asia and state-of-the-art REACH databases and infrastructure (e.g. substance volume tracking (SVT) under SAP) we can offer full service in the compliance field along with tailor-made market-

ing strategies. We also hold a portfolio of more than 900 pre-registered substances to save time and money for our business partners around the world seeking access to the European market.

REACH competency at work

Right from the start in 2007, the new DKSH task force's focus was to match REACH pre-registration and registration deadlines, to build in-house regulatory competence, and to develop REACH tools based on our standard IT platforms Lotus Notes and SAP. In early 2008, a Lotus Notes based REACH database was implemented. With this efficient and hands-on tool DKSH could handle the large amount of their chemical sub-

stances for their business partners, collect and consolidate relevant information, and store data sets in a standard format. The validated and approved data of more than 900 substances was pre-registered with the European Chemicals Agency (ECHA) authorities. After pre-registration, a so-called Substance Information Exchange Forum (SIEF) was formed for each substance. Due to the high number of substances, we are now members in more than 900 SIEFs. In addition, our own in-house IT services (CSSC) developed a Lotus Notes application called REACH Communication Tool (RCT) to manage all communication relating to REACH and exchange information with other SIEF members.

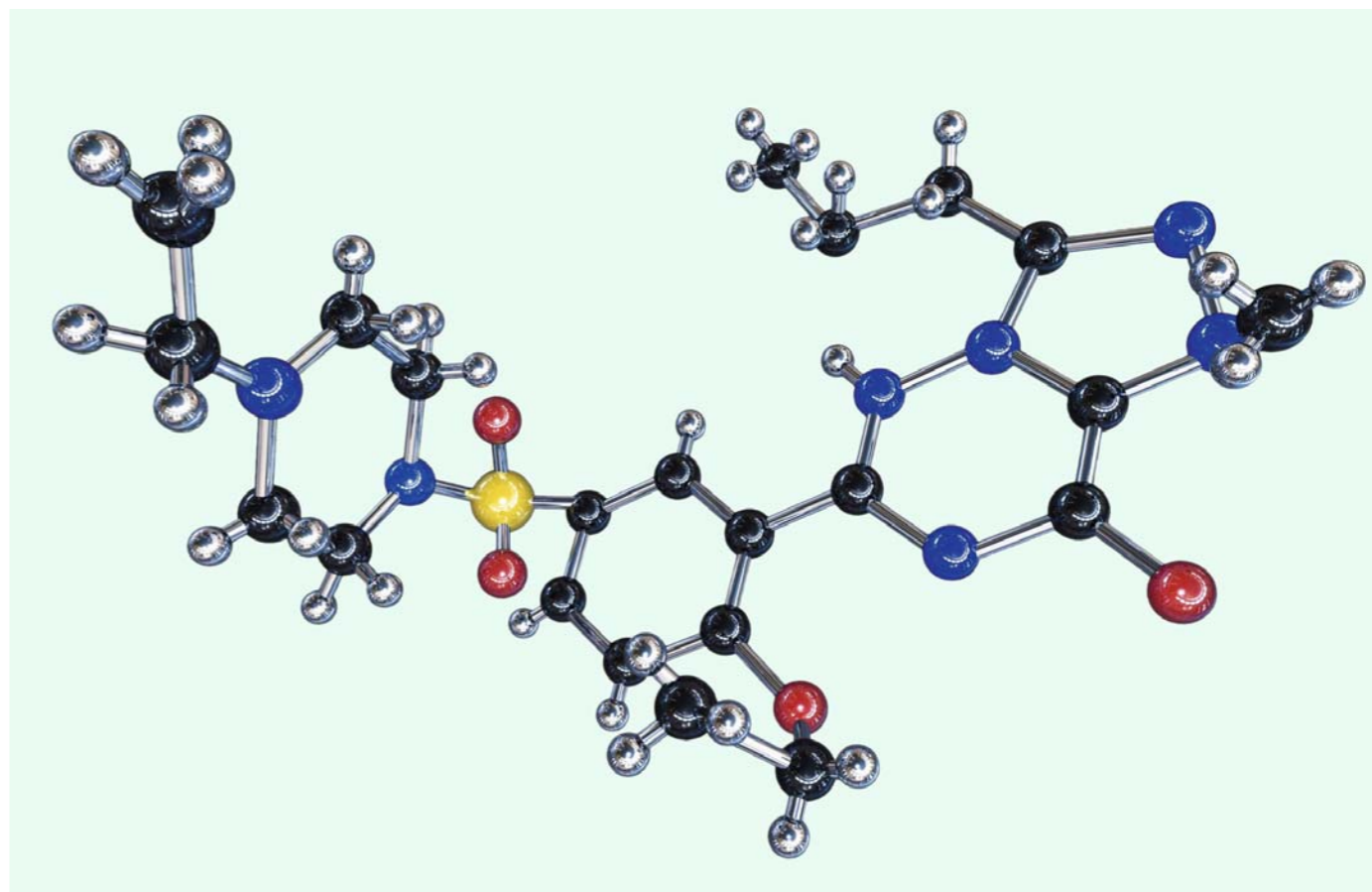


REACH – key facts

On June 1, 2007, new chemicals regulation took effect that fundamentally changes chemical control in the EU. The main aim of REACH is registration: 30,000 substances currently sold in the EU must now be registered with the new European Chemicals Agency (ECHA). Manufacturers and importers of chemicals have to submit dossiers on the properties of their substances, their uses, and safe ways of handling them. The burden of proof for demonstrating the safe use of chemicals

has been transferred from member states to the industry. Enterprises that manufacture or import more than one metric ton of a substance per year now have to register. Responsibility for registration falls upon EU chemical producers and importers into the EU. Importers and distributors like DKSH are now legally responsible for full compliance with the legislation. The changes aim to improve human health, increase environmental protection, and enhance the competitiveness of the EU chemicals industry. Transitional periods for

so-called phase-in substances will be granted in order to establish a registration dossier. Pre-registration is required for phase-in substances so that manufacturers and importers can benefit from the transitional regime and continue with manufacture or import while preparing their registration. Depending on substance volumes (per year and manufacturer or importer) and substance risks, transitional periods will last until 2010, 2013, or 2018.



Globally Harmonized System (GHS)

Based on the experience acquired on REACH, our experts are now implementing the new Classification, Labelling, and Packaging of Substances and mixtures known as the CLP regulation, the European version of the Globally Harmonized System (GHS) for Classification and Labelling of chemicals. More than 600 substances sold by DKSH will have their classification reevaluated in 2010. Thanks to our toxicologist and ecotoxicologists experts!

REACH and CLP will bring new format to the Safety Data Sheet (SDS), the unique document to provide safety and regulatory information about the chemical along the supply chain.

In 2010, several countries around the world are implementing a REACH-like regulation of the chemicals imported into their territory, i.e. Japan, China.

GHS for the classification and labelling of chemicals will also enter into force worldwide at different time schedules within the next coming years.

Our SEQRA organization will allow spread of competence and expertise about REACH implementation and from CLP in Europe to GHS in Japan, China, South Korea, etc. through our local experts.

GHS – key facts

The CLP Regulation is the new European regulation on classification, labelling and packaging of chemical substances and mixtures (preparations). It introduces in the EU new criteria for classification and labelling, based on the United Nation's Globally Harmonized System (UN GHS). It provides rules for the notification of substances to the Classification & Labelling Inventory established by the European Chemicals Agency (ECHA).

Companies selling chemicals in EU/EEA countries have to reclassify their Chemicals in line with the new Classification, Labelling and Packaging Regulation by December 1, 2010. For the hazardous substances, the CLP classification has to be notified to the European Chemicals Agency by January 3, 2011. Mixtures placed on the market must be classified according to the CLP criteria as of June 1, 2015.



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