

COSMETIC PRODUCT SAFETY REPORT

PRODUCT: Sanitex MVP Foam With Anti-Bacterial Action - MVP21002

DATE: 6 November 2020

Responsible Person: Robert Dix
Vectair Systems Ltd
Unit 3, Trident Centre
Armstrong Road
Basingstoke, Hampshire RG24 8NU



PART A – Cosmetic Product Safety Information

1. Quantitative and qualitative composition

	Ingredient INCI name	CAS	Function	Limits	Amount
1	Aqua	7732-18-5	Solvent		86.252966
2	Sodium laureth sulfate	3088-31-1 / 9004	Cleansing, emulsifying,		7.70
3	Cocamidopropyl betaine	61789-40-0	Antistatic, cleansing, foam		2.325
4	Glycerin	56-81-5	Denaturant, hair		1.032
5	Phenoxyethanol	122-99-6	Preservative	V/29	0.50
6	Styrene/acrylates copolymer	9010-92-8	Film forming, opacifying		0.40
7	Citric acid	77-92-9 / 5949	Buffering, chelating,		0.39
8	Sodium chloride	7647-14-5	Bulking, masking, oral care,		0.375
9	Sodium benzoate	532-32-1	Anticorrosive, masking,	V/1	0.3375
10	Coco-glucoside	110615-47-9	Cleansing, foaming,		0.31
11	Glyceryl oleate	25496-72-4 / 111	Emollient, emulsifying,		0.31
12	Triethylene glycol	112-27-6	Masking, solvent, viscosity		0.03
13	Sodium hydroxide	1310-73-2	Buffering, denaturant	III/15a	0.016
14	Sodium lauryl sulfate	151-21-3	Cleansing, denaturant,		0.015
15	Magnesium nitrate	10377-60-3	Hair conditioning		0.0025
16	Magnesium chloride	7786-30-3	Viscosity controlling		0.002
17	Methylchloroisothiazolinone	26172-55-4	Preservative	V/39	0.00106
18	CI 47005	8004-92-0	Cosmetic colorant		0.000453
19	Methylisothiazolinone	2682-20-4	Preservative	V/39	0.00035
20	CI 42051	3536-49-0	Cosmetic colorant		0.000171

Allergens present in this product and estimated amounts*:
None

* The presence of these allergens must be indicated in the list of ingredients when their concentration exceeds: 0.001% in leave-on products or 0.01% in rinse-off products

2. Physical & chemical properties and stability

2.1.1 Physical/chemical properties of ingredients (substances or mixtures)

See section 1. Quantitative and qualitative composition – additional specification of ingredients.

Ref. 1. 1 **Aqua**

Aqua (water) is a liquid at standard temperature and pressure with the chemical formula H_2O : one molecule of water has two hydrogen atoms covalently bonded to a single oxygen atom.

Ref. 1. 2 **Sodium laureth sulfate**

Sodium laureth sulfate, also known as sodium lauryl ether sulfate (SLES), is an anionic detergent and surfactant used as a foaming agent in personal care products. SLES is prepared by ethoxylation of dodecyl alcohol. The resulting ethoxylate is converted to a half ester of sulfuric acid, which is neutralized by conversion to the sodium salt. Its molecular formula is $CH_3(CH_2)_{11}(OCH_2CH_2)_nOSO_3Na$.

Ref. 1. 3 **Cocamidopropyl betaine**

Cocamidopropyl betaine (CAPB), a zwitterionic compound consisting of both a quaternary ammonium cation and a carboxylate with the molecular formula $C_{19}H_{38}N_2O_3$, is used primarily by the cosmetic industry as a pseudoamphoteric surfactant in shampoos, conditioners, and other cleansing preparations. CAPB is considered a pseudoamphoteric because the quaternary nitrogen of the betaine group cannot donate a proton at pHs above its pKa, never becoming anionic. Manufacture of CAPB involves preparation of dimethylaminopropyl cocoamide (3-cocamidopropyldimethylamine) by reacting coconut oil or (hydrolysed, glyceryl-free) coconut acid with dimethylaminopropylamine in aqueous solution. The dimethylaminopropyl cocoamide, a tertiary amine, is then reacted with sodium chloroacetate to form CAPB and sodium chloride. In 2012 the Cosmetic Ingredient Review Expert Panel reasserted its 1991 conclusion that Cocamidopropyl betaine is safe in cosmetic products in its current concentration as described in this safety assessment when formulated to be non-sensitising.

Ref. 1. 4 **Glycerin**

Glycerin, or glycerol, is a simple polyol compound, with three hydroxyl groups, which is a colourless, odourless, viscous liquid. Glycerin is naturally occurring in all animals and plant matter in combined form as glycerides in fats and oils, or, in intracellular spaces, as lipids. The glycerol backbone is central to all triglycerides, and its molecular formula is $C_3H_8O_3$. In December 2014 the Cosmetic Ingredient Review (CIR) Expert Panel also noted the high frequency of use that is reported for glycerin and the low instances of reports of toxicity, irritation, and sensitisation and that glycerin is GRAS for food packaging and as a multiple-purpose food substance. When considering the safety of glycerin, the Panel noted that it is naturally occurring in animal and human tissues, including the skin and blood. The data demonstrated low oral and dermal toxicity for multiple animal species and humans, in both acute and long-term studies. The CIR Expert Panel concluded that glycerin is safe in the present practices of use and concentration described in this safety assessment.

2. Physical & chemical properties and stability

2.1.1 Physical/chemical properties of ingredients (substances or mixtures)

See section 1. Quantitative and qualitative composition – additional specification of ingredients.

Ref. 1. 5 **Phenoxyethanol**

Phenoxyethanol is an aromatic glycol ether with an alcohol moiety, used in cosmetics as a preservative at concentrations below 1%, with the molecular formula $C_8H_{10}O_2$. Phenoxyethanol is made by reacting phenol with ethylene oxide in the presence of a basic catalyst under pressure and with heating; the resulting product is neutralised, and purified to the point where 4-8% of the Phenoxyethanol is converted to the diethoxylate, thereby reducing the free phenol content. In 1990 the Cosmetic Ingredient Review (CIR) Expert Panel concluded that Phenoxyethanol is safe for use as a cosmetic ingredient in the present practice of use and concentration detailed in this safety assessment. In 2011 The CIR Expert Panel reconfirmed that conclusion.

Ref. 1. 6 **Styrene/acrylates copolymer**

Styrene/acrylates copolymer is a polymer of styrene and a monomer consisting of acrylic acid, methacrylic acid or one of their simple esters.

The Food and Drug Administration (FDA) has reviewed the safety of Styrene/acrylates copolymer and permits the use as indirect food additives for use in coatings of food packaging. The safety of copolymers and polymers that contain the acrylic acid monomer has been assessed by the Cosmetic Ingredient Review (CIR) Expert Panel. The CIR Expert Panel evaluated the scientific data and concluded that Styrene/acrylates copolymer was safe for use in cosmetics and personal care products when formulated to avoid skin irritation.

Ref. 1. 7 **Citric acid**

Citric acid is a hygroscopic α and β hydroxytricarboxylic acid, naturally found in citrus fruits, with the molecular formula $C_6H_8O_7$. Structurally Citric acid is an α -hydroxy acid (AHA) and is a slightly stronger acid than typical carboxylic acids because the anion can be stabilised by intramolecular hydrogen-bonding from other protic groups on citric acid. Industrial Citric acid is produced by mycological fermentation of crude sugar stocks by strains of *Aspergillus niger*. The FDA has listed Citric acid as Generally Recognized As Safe (GRAS) and it is commonly used in the food industry as an acidifier and flavouring agent and has the food additive number E330. In 2014 the Cosmetic Ingredient Review (CIR) Expert Panel concluded that Citric acid is safe in the present practices of use and concentration, as described in this safety assessment.

2. Physical & chemical properties and stability

2.1.1 Physical/chemical properties of ingredients (substances or mixtures)

See section 1. Quantitative and qualitative composition – additional specification of ingredients.

Ref. 1. 8 **Sodium chloride**

Sodium chloride, also known as salt, common salt, or halite, is a compound with equal proportions of sodium and chlorine with the molecular formula NaCl representing a 1:1 ratio of sodium and chloride ions. In addition to being an important component of food, the US FDA includes Sodium chloride on its list of substances considered Generally Recognised as Safe (GRAS) as a substance migrating to food from packaging. The Cosmetic Ingredient Review (CIR) has deferred evaluation of this ingredient because the safety has already been assessed by FDA. Sodium chloride is commonly consumed and presents no safety issues whatsoever in this cosmetic product.

Ref. 1. 9 **Sodium benzoate**

Sodium benzoate is the sodium salt of benzoic acid with the molecular formula $C_7H_5NaO_2$ and is a widely used food preservative, with the E number E211. In 2001 the Cosmetic Ingredient Review (CIR) Expert Panel concluded that Sodium benzoate is safe to use in cosmetic products. In September 2011 the CIR Expert Panel reassessed Sodium benzoate and reconfirmed that it is safe in the present practices of use and concentration as described in this safety assessment.

Ref. 1. 10 **Coco-glucoside**

Coco-glucoside is an alkyl glucoside produced by the condensation of coconut alcohol with glucose. The Duhring Chamber Test lists Coco-glucoside as having the lowest irritation score of all common surfactants. In 2013, the Cosmetic Ingredient Review (CIR) Expert Panel concluded that Coco-glucoside is safe in the present practices of use and concentration when formulated to be non-irritating.

Ref. 1. 11 **Glyceryl oleate**

Glyceryl oleate is composed of glycerin and oleic acid, a naturally occurring fatty acid. Molecular formula: $C_{21}H_{38}O_5$

The Food and Drug Administration (FDA) includes Glyceryl oleate on its list of direct food substances considered Generally Recognized As Safe (GRAS). The safety of Glyceryl oleate has been assessed by the Cosmetic Ingredient Review (CIR) Expert Panel. The CIR Expert Panel evaluated the scientific data and concluded that Glyceryl oleate was safe as a cosmetic ingredient in the present practices of use and concentration. In 2004, as part of the scheduled re-evaluation of ingredients, the CIR Expert Panel considered available new data on Glyceryl oleate and reaffirmed the above conclusion.

2. Physical & chemical properties and stability

2.1.1 Physical/chemical properties of ingredients (substances or mixtures)

See section 1. Quantitative and qualitative composition – additional specification of ingredients.

Ref. 1. 12 **Triethylene glycol**

Triethylene glycol, also known as TEG or triglycol, is a straight-chain dihydric alcohol aliphatic compound terminated on both ends by a hydroxyl group. It is a clear, practically colourless and odourless, hygroscopic liquid at room temperature with the molecular formula $\text{HOCH}_2\text{CH}_2\text{OCH}_2\text{CH}_2\text{OCH}_2\text{CH}_2\text{OH}$. The safety of Triethylene glycol was been assessed by the Cosmetic Ingredient Review (CIR) Expert Panel in 2006 and 2010. The CIR Expert Panel evaluated the scientific data and concluded that Triethylene glycol is considered safe for use in cosmetics in the present practices of use and concentration.

Ref. 1. 13 **Sodium hydroxide**

Sodium hydroxide is a metallic base and alkali salt with the molecular formula NaOH . It is produced by treating oxides with water, known as brine electrolysis. In June 2015 The Cosmetic Ingredient Review Expert Panel noted that in humans, sodium hydroxide was irritating at concentrations as low as 0.5%. The US Food and Drug Administration (FDA) includes Sodium hydroxide on its list of substances affirmed as Generally Recognised as Safe (GRAS) for direct addition to food. Sodium hydroxide is safe in the present practices of use and concentration as described in this safety assessment.

Ref. 1. 14 **Sodium lauryl sulfate**

Sodium lauryl sulfate (SLS), Sodium dodecyl sulfate (SDS or NaDS), sodium lauryl sulfate is an organic compound with the formula $\text{CH}_3(\text{CH}_2)_{11}\text{OSO}_3\text{Na}$. SLS is synthesised by treating lauryl alcohol with sulfur trioxide gas (commonly), oleum, or chlorosulfuric acid to produce hydrogen lauryl sulfate. The resulting product is then neutralised by adding sodium hydroxide or sodium carbonate. SLS is a salt of an organosulfate consisting of a 12-carbon tail attached to a sulfate group, giving the material the amphiphilic properties required of a detergent and is used as an anionic surfactant in many cleaning and hygiene products.

Ref. 1. 15 **Magnesium nitrate**

Magnesium nitrate is a hygroscopic salt with the formula $\text{Mg}(\text{NO}_3)_2$ used as a stabiliser in the preservative mixture of 5- Chloro-2-methyl-isothiazolin-3(2H)-one and 2-Methylisothiazolin-3(2H)-one. The mixture of 5- Chloro-2-methyl-isothiazolin-3(2H)-one and 2-Methylisothiazolin-3(2H)-one with magnesium chloride and magnesium nitrate is currently listed in Annex VI, part 1 and consequently allowed for use in cosmetic products under the conditions and restriction laid down in the Annex. Magnesium nitrate is safe in the present practices of use and concentration described in this safety assessment.

2. Physical & chemical properties and stability

2.1.1 Physical/chemical properties of ingredients (substances or mixtures)

See section 1. Quantitative and qualitative composition – additional specification of ingredients.

Ref. 1. 16 **Magnesium chloride**

Magnesium chloride $MgCl_2$ is a naturally occurring mineral salt, an ionic halide compound, commonly obtained from sea water and brine. In its pure form, it is a colourless, odourless, powdery compound with a bitter taste highly soluble in water. Magnesium chloride is a food additive referred to as E 511 and also used as a nutritional supplement.

Ref. 1. 17 **Methylchloroisothiazolinone**

Methylchloroisothiazolinone (5-chloro-2-methyl-4-isothiazolin-3-one, MCI) is a derivative of isothiazolinone, a heterocyclic chemical compound, used as a biocide. Following the submission of a fully updated dossier by the industry in 2006, the SCCS adopted the opinion in 2009, "On the basis of the data submitted, the SCCS is of the opinion that the mixture of 5-chloro-2-methyl-4-isothiazolin-3-one and 2-methyl-4-isothiazolin-3-one in a ratio of 3:1 does not pose a risk to the health of the consumer when used as a preservative up to a maximum authorised concentration of 0.0015 % in rinse-off cosmetic products, apart from its sensitising potential."

Ref. 1. 18 **CI 47005**

CI 47005, also known as Quinoline yellow, has the molecular formula $C_{18}H_9NNa_2O_8S_2$.

CI 47005 may be safely used for colouring cosmetics and personal care products.

Ref. 1. 19 **Methylisothiazolinone**

Methylisothiazolinone (2-methyl-4-isothiazolin-3-one, MIT, MI) is a biocide used to control microbial growth in water-containing solutions. In 2004, the European Scientific Committee on Cosmetic Products and Non-Food Products Intended for Consumers (SCCNFP) stated "The SCCNFP is of the opinion that the proposed use of Methylisothiazolinone as a preservative at a maximum concentration of 0.01% (100 ppm) in the finished cosmetic product does not pose a risk to the health of the consumer." In March 2014 the SCCS stated "There is no adequate information to suggest a safe dose of MI in leave-on cosmetic products from the view of induction of sensitisation, although circa 3.8 ppm, as present in MCI/MI, may be indicative. The wealth of clinical data demonstrates that 100 ppm MI sensitises."

Ref. 1. 20 **CI 42051**

CI 42051, also known as Patent blue V, has the molecular formula $C_{54}H_{62}CaN_4O_{14}S_4$.

PART A – Cosmetic Product Safety Information *continued*

2. Physical & chemical properties and stability *continued*

2.1.2 Physical/chemical properties of the cosmetic product

Appearance	Cream/Paste/Gel
Colour	White
Aroma	Fragrance free
pH	4.5 - 5.0

*RP: Responsible Person: Vectair Systems Ltd

2.2 Stability of the cosmetic product

The ingredients used in the production of the cosmetic product comply with the relevant legal regulations.

Both the product and constituent ingredients are stable under normal use and warehousing conditions during the entire time of the PAO 12M period.

2.2.1 Vectair Systems Ltd confirms that all product stability tests reflect the stability of the product which is to be placed on the market.

2.2.2 Vectair Systems Ltd uses a PAO 12M based on the results of Vectair Systems Ltd 's stability testing, including shelf life stability testing.

2.2.3 This product was subjected to Preservative Efficacy Testing and proved that it did not support microbial growth. PET reference: Schülke & Mayr 13-1457

3. Microbiological quality

3.1.1 Microbiological specification of ingredients (substances and mixtures).

Based on available information from the ingredient specification (see section 1. Quantitative and qualitative composition – specification of ingredients), the ingredients used can be assessed as microbiologically safe.

3.1.2 Microbiological specification of the finished product

The given cosmetic product can be regarded as microbiologically safe for consumers' health

under the ISO 29621:2010 standard “Cosmetics -- Microbiology -- Guidelines for the risk assessment and identification of microbiologically low-risk products”.

The microbiological harmlessness of the ingredients and the cosmetic product is assessed according to COLIPA: Guideline for Microbiological Quality Management (MQM).

This product was subjected to Preservative Efficacy Testing and proved that it did not support microbial growth. PET reference: Schülke & Mayr 13-1457

4. Impurities, trace amounts of forbidden substances, & information about packaging material

4.1 Impurities and trace amounts of forbidden substances

According to specifications (see section 2.1.1 Physical/chemical properties of ingredients (substances or mixtures) submitted by ingredient suppliers, the ingredients do not contain impurities or trace amounts of forbidden substances.

Any impurities or traces identified in any ingredient above standard tolerances are noted against each respective ingredient in section 2.1.1.

4.2 Information about packaging material

The packaging material applied is suitable for the given type of cosmetic product and meets the predictable use requirements.

Container	Bottle
Container Material	PET
Airless Container	No

The available research suggests that the concentration of phthalates in the contents of PET bottles varies as a function of the contents of the bottle, with phthalates leaching into lower pH products. Temperature also appears to influence the leaching both of phthalates and of antimony from PET, with greater leaching at higher temperatures.

The evidence also suggests that PET bottles may yield endocrine disruptors under conditions of common use, particularly with prolonged storage and elevated temperature.

Therefore it is advisable, in using PET containers, to ensure a minimum pH of 4.0 and to store products at cooler temperatures using a shorter BBE period.

Vectair Systems Ltd confirms that the results of reference sample monitoring show no reaction between the packaging material and the product during the product's stated minimum useable life. During that life no changes to physical and chemical properties of the product were noticed that would affect its usability and safety.

5. Normal and reasonably foreseeable use

The current label advice:

The label of this cosmetic product should include this special note regarding its use, in compliance with Article 19(1)(d) of *Cosmetic Regulation* (EC) No. 1223/2009:

For external use only. Keep out of reach of children.

6. Exposure to the cosmetic product

Area of application	Hand
Product type: Leave-on or Rinse-off	Rinse Off
Duration and frequency	10
Possible additional routes of exposure	Body
Estimated skin surface area (cm ²)	860
Estimated amount of the product applied according to the SCCS (g/day)	20.00 g
Estimated retention factor according to the SCCS	.01
Target group	Adult
Calculated relative daily exposure according to the SCCS (mg/kg bw/day)	3.33

7. Exposure to the ingredients

	Ingredient INCI name	Concentration	SED
1	Aqua	0.86253	0.02872
2	Sodium laureth sulfate	0.07700	0.00256
3	Cocamidopropyl betaine	0.02325	0.00077
4	Glycerin	0.01032	0.00034
5	Phenoxyethanol	0.00500	0.00017
6	Styrene/acrylates copolymer	0.00400	0.00013
7	Citric acid	0.00390	0.00013
8	Sodium chloride	0.00375	0.00012
9	Sodium benzoate	0.00338	0.00011
10	Coco-glucoside	0.00310	0.00010
11	Glyceryl oleate	0.00310	0.00010
12	Triethylene glycol	0.00030	0.00001
13	Sodium hydroxide	0.00016	0.00001
14	Sodium lauryl sulfate	0.00015	0.00000
15	Magnesium nitrate	0.00003	0.00000
16	Magnesium chloride	0.00002	0.00000
17	Methylchloroisothiazolinone	0.00001	0.00000
18	CI 47005	0.00000	0.00000
19	Methylisothiazolinone	0.00000	0.00000
20	CI 42051	0.00000	0.00000

SED: Systemic Exposure Dose

8. Toxicological profile of the ingredients in the formulation

	Ingredient INCI name	MOS
1	Aqua	3481622.88470
2	Sodium laureth sulfate	780000.78000
3	Cocamidopropyl betaine	8912137.94440
4	Glycerin	36664571.54830
5	Phenoxyethanol	7567567.56760
6	Styrene/acrylates copolymer	37537537.53750
7	Citric acid	23100023.10000
8	Sodium chloride	24024024.02400
9	Sodium benzoate	27939050.16130
10	Coco-glucoside	79434272.98270
11	Glyceryl oleate	513416642.44890
12	Triethylene glycol	1701701701.70170
13	Sodium hydroxide	18768768.76880
14	Sodium lauryl sulfate	257857857.85790
15	Magnesium nitrate	6534534534.53450
16	Magnesium chloride	12162162162.16220
17	Methylchloroisothiazolinone	1362683438.15510
18	CI 47005	42426532492.75770
19	Methylisothiazolinone	1716001716.00170
20	CI 42051	35122842140.38600

MOS: Margin of Safety

8. Toxicological profile of the ingredients in the formulation - continued

Based on the calculation of MoS (Margin of Safety) for ingredients that can be classified as hazardous to human health, the product does not contain ingredients with toxicologically significant profiles in terms of consumer health.

An ingredient with an MoS above 1000 is considered safe. An ingredient with an MoS above 100 but lower than 1000 must be further considered by the assessor.

Since all of the ingredients have a margin of safety above 1,000 this product is considered safe for consumers to use.

9. Undesirable effects and serious undesirable effects

The cosmetic product with a similar composition has been supplied to the market in the long term and until nowadays, no undesired effects to human health have been noticed in relation to the use of this product. Therefore, no undesired effects are anticipated at the common and reasonably predictable application of the given cosmetic product.

After its launch, the cosmetic product will be further monitored by Vectair Systems Ltd in accordance to procedures detailed in *Cosmetic Regulation* (EC) No 1223/2009. The safety of the product should be reviewed on a regular basis. To that end, undesirable and serious undesirable effects on human health during in market use of the product should be filed (complaints during normal and improper use, and the follow-up done) and details forwarded to the safety assessor.

The safety assessor will then update the Cosmetic Product Safety Report (CPSR) based on the new findings and the adopted corrective measures.

10. Additional information on the product

No additional information is available and no additional studies were carried out.

11. References

- THE SCCS'S NOTES OF GUIDANCE FOR THE TESTING OF COSMETIC SUBSTANCES AND THEIR SAFETY EVALUATION 8TH REVISION
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:342:0059:0209:en:PDF>
- MSDS of ingredients
- Commission Implementing Decision of 25th November 2013 Guidelines on Annex I to Regulation (EC) No 1223/2009 of the European Parliament and of the Council on cosmetic products
- SCCS - Opinions
http://ec.europa.eu/health/scientific_committees/consumer_safety/opinions/index_en.htm
- CosIng: the European Commission database on cosmetic substances
<http://ec.europa.eu/consumers/cosmetics/cosing/index.cfm?fuseaction=search.simple>
- REGULATION 1223/2009 ANNEXES
http://ec.europa.eu/consumers/cosmetics/cosing/index.cfm?fuseaction=ref_data.annexes_v2

PART B – Cosmetic Product Safety Assessment

1. Assessment conclusion

Based on the information supplied, the cosmetic product detailed in this report is safe for human health when used in common or reasonably predictable conditions in compliance with the instructions provided for the consumer.

This conclusion is only applicable to this cosmetic product with the composition, properties, purpose, and method of use of which are detailed in this documentation, and laboratory tests attached to this assessment, including the detailed production and labelling which has been assessed as meeting the requirements of *Cosmetic Regulation* (EC) No. 1223/2009 effective on the date this report was issued.

2. Labelled warnings and instructions of use

The label of this cosmetic product should include this special note regarding its use, in compliance with Article 19(1)(d) of *Cosmetic Regulation* (EC) No. 1223/2009:

For external use only. Keep out of reach of children.

Allergens present in this product and estimated amounts*:

* The presence of these allergens must be indicated in the list of ingredients when their concentration exceeds: 0.001% in leave-on products or 0.01% in rinse-off products. Only the allergen, not the estimated amount, is required on the label.

3. Reasoning

Based on the formulation of this cosmetic product, its qualitative and quantitative composition according to its INCI ingredients, basic physical and chemical characteristics and microbiology, Preservation Challenge Test performed, classification of the cosmetic product type, including its purpose and method of application, and available toxicological information and safety sheets of the ingredients used, the cosmetic product safety has been assessed for the consumer by assessing the toxicological profile of all ingredients, their chemical structure, exposure level and Margin of Safety (MoS) depending on the purpose of use in this cosmetic product.

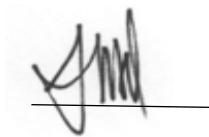
This cosmetic product contains only the allowed ingredients in allowed concentrations. For ingredients with safety limits as specified in Annexes to *Cosmetic Regulation* (EC) No. 1223/2009, no ingredient exceeds the allowable safety limit therefore is a safe concentration in this cosmetic product. The evaluation of the entire composition and applied ingredient concentrations indicate that as a whole the composition of this cosmetic product complies with the requirements of *Cosmetic Regulation* (EC) No. 1223/2009 of the European Parliament and of the Council.

4. Assessor's credentials and approval of Part B

Safety Assessor: Allison Wild
Oxford Biosciences Ltd.
The Oxford Science Park
Magdalen Centre
Oxfordshire
OX4 4GA

Experience and qualifications:

- MSc in Clinical Pharmacology, University of Oxford
- 15+ years experience formulating cosmetic products
- Full member of the Society of Cosmetic Scientists (SCS)
- Member of the British Pharmacological Society



Signature

6 November 2020

Date