



## Statement on Material Compliance

### Regarding REACH, RoHS, POP, TSCA Section 6(h), and Conflict Minerals

M&C TechGroup takes its responsibility related to material compliance very seriously. We actively work to check our products for the presence of hazardous substances.

The information provided here regarding M&C TechGroup's products is reliable to the best of our knowledge and belief as of the date of the Declarations of Conformity. However, we do not accept any liability for the accuracy and completeness of the information provided by our suppliers.

This Statement refers to the following directives and regulations:

#### 1. REACH Regulation (EC) No. 1907/2006

EU Regulation 1907/2006/EC concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) regulates the handling of chemical substances in preparations and products.

According to the REACH Regulation, the products supplied by M&C TechGroup are to be classified as “articles” (see Art. 3 para. 3 of the REACH Regulation) and are therefore not subject to any registration, evaluation or authorization requirements.

In accordance with Article 33(1) of the REACH Regulation, M&C TechGroup is obligated to pass on information on substances in articles if one of the articles supplied contains a substance of very high concern (SVHC) in a mass concentration of more than 0.1 % (w/w).

The following substances of very high concern (SVHC) are currently contained in our products.

**Table 1: References to SVHC Substances**

| SVHC-Substances                             | CAS No.    | Usage   |
|---|------------|---|
| Lead  | 48122-14-1 | Alloy component in steel, aluminum and brass                |
| Dodecamethylcyclohexasiloxane D4, D5 and D6 | 540-97-6   | Plasticizers in plastics                                    |
| Hexahydromethylphthalic anhydride           | 48122-14-1 | Plasticizers and coatings in plastics in electronic devices |
| Hexahydromethylphthalic anhydride           | 25550-51-0 | Plasticizers and coatings in plastics in electronic devices |
| Hexahydro-4-methylphthalic anhydride        | 19438-60-9 | Plasticizers and coatings in plastics in electronic devices |
| Hexahydro-3-methylphthalic anhydride        | 57110-29-9 | Plasticizers and coatings in plastics in electronic devices |
| C,C'-Azodi(formamid)                        | 123-77-3   | Plastics, insulating materials                              |

|  |            |   |
|--|------------|---|
| 6,6'-Di-tert-butyl-2,2'-methylen-di-p-cresol | 119-47     | Adhesives, lubricants, hydraulic fluids |
| Terphenyl, hydrogenated                      | 61788-32-7 | Adhesives, lubricants, plasticizers     |

<http://echa.europa.eu/web/guest/candidate-list-table>

In addition, and to date, none of the products contains substances subject to authorization by REACH Annex XIV. The prohibitions on the use of substances by REACH Annex XVII are also observed and complied with.

## 2. RoHS Directive 2011/65/EU including Delegated Directive 2015/863/EU

RoHS means "Restriction of Hazardous Substances". The directive aims to reduce the proportion of particularly hazardous substances such as heavy metals (e.g. lead or chromium (VI)) and substances such as certain plasticizers in electrical and electronic equipment as far as possible by setting limit values. The maximum concentration of these substances in homogeneous materials is 0.1% (w/w), except for cadmium, which has a maximum mass concentration of 0.01% (w/w).

In some of our products, lead is used as an alloying element in steel, aluminum and copper, in heat-resistant solders as well as in electrical or electronic components made of glass or ceramics. The current exemptions listed in the RoHS Directive, Annex III, for the use of lead in our products are as follows:

- 6a: Lead as an alloying element in steel with a maximum lead content of 0.35 % w/w
- 6b: Lead as an alloying element in aluminum with a maximum lead content of 0.4 % w/w
- 6c: Copper alloy with a lead content of up to 4 % w/w
- 7a: Lead in refractory solders
- 7c: Lead-containing electrical and electronic components in glass or ceramic materials

Furthermore, neither chromium (VI) nor mercury are used in M&C TechGroup products.

## 3. POPs Regulation (EU) No. 2019/1021

According to Article 3 of the POPs Regulation, the manufacture, placing on the market, and use of the substances listed in Annex I are prohibited. According to current information from our suppliers, none of these POP substances are contained in our products or are to be deliberately added in the future. <https://echa.europa.eu/de/list-of-substances-subject-to-pops-regulation>

## 4. Toxic Substance Control Act (TSCA) Section 6 (h)

Based on current data provided by our suppliers, our products do not contain any of the PBT substances listed below in accordance with TSCA section 6 (h) and do not exceed the permitted concentrations.

- Decabromdiphenylether (DecaBDE), CAS No. 1163-19-5

- Phenol, isopropylated, phosphate 3:1 (PIP 3:1), CAS No. 68937-41-7
- 2,4,6-Tris(1,1-dimethylethyl)phenol (2,4,6-TTBP), CAS No. 732-26-3
- Hexachlorobutadiene (HCBD), CAS No. 87-68-3
- Pentachlorobenzenethiol (PCTP), CAS No. 133-49-3

<https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/persistent-bioaccumulative-and-toxic-pbt-chemicals>

## 5. Conflict Minerals (CM)

M&C TechGroup takes its social responsibility to comply with conflict minerals or 3TGs (gold, tantalum, tin, and tungsten) regulations very seriously. We actively work with our supply chain to ensure that no conflict minerals are added to our products that originate from companies that directly or indirectly finance conflict-affected countries.

To support compliance with applicable requirements for the sourcing of conflict minerals, M&C TechGroup expects its suppliers to conduct conflict minerals due diligence along the supply chain. In addition, suppliers submit their reports using the Conflict Minerals Reporting Template (CMRT), which includes compliant smelters declared by Responsible Minerals Initiatives (RMI) audit records or recognized audit partners.

## 6. Concluding Remark

This information has been compiled to the best of our knowledge and belief and is valid at the time of publication. However, the Declaration of Conformity may be subject to change due to the constantly evolving legal framework and must therefore be reviewed and updated regularly.

Ratingen, February 27, 2025



Hans-Jörg Rumm

Chief Technology Officer (CTO)