

RoHS, REACH, POP, PFAS, CP65 and TSCA statements of COSEL

1. RoHS - EU-directive 2011/65/EU including the additions of 2015/863/EU

In response to the legislated environmental directives being instituted throughout the world, the Cosel has established processes and policies to ensuring the compliance with laws and directives. The RoHS legislation (Restriction of the use of certain hazardous substances) restricts the use of following hazardous substances in our products:

1. Lead (Pb)
2. Mercury (Hg)
3. Cadmium (Cd)
4. Hexavalent chromium (Cr⁶⁺)
5. Polybrominated biphenyls (PBB)
6. Polybrominated diphenyl ether (PBDE)
7. Bis(2-ethylhexyl) phthalate (DEHP)
8. Butyl benzyl phthalate (BBP)
9. Dibutyl phthalate (DBP)
10. Di isobutyl phthalate (DIBP)

The maximum permitted concentration is 0.1% or 1000 ppm (except for cadmium, which is limited to 0.01% or 100 ppm) by weight of each homogeneous material in the product.

We hereby declare that all as RoHS conform declared products, manufactured and supplied by COSEL, meets the directive 2011/65/EU including the additions of directive 2015/863/EU.

Our products include exemptions in accordance with Annex III of Directive 2011/65/EU. The use of lead is permitted based on applicable exemptions, including but not limited to exemptions 6(a)-I, 6(c), 7(a), 7(c)-I, 7(c)-II, 8(b)-I and 34 of Annex III of Directive 2011/65/EU, as currently in force. These exemptions cover, for example, the use of lead as an alloying element in steel, aluminium, and copper alloys, the use of lead in high melting temperature type solders, and the use of lead in glass or ceramics of electronic components.

COSEL continuously monitors regulatory developments related to the RoHS Directive and Annex III. In the event that applicable exemptions are revised, renewed, or expire, COSEL intends to promptly review and update its compliance approach, including the consideration of alternative materials and technologies, in order to maintain compliance with applicable legal requirements.

2. REACH – Declaration according to (EC) 1907/2006, Article 33

REACH (Registration, Evaluation, Authorization and Restriction of Chemicals) (EG) 1907/2006 is a European regulation for the registration, evaluation, authorization and restriction of chemicals and came into force on June 1, 2007. REACH deals with the production and use of chemicals and their potential impact on people and the environment.

(EC)1907/2006, Article 33: Duty to communicate information on substances in articles
(1) Any supplier of an article containing a substance meeting the criteria in Article 57 and identified in accordance with Article 59(1) in a concentration above 0,1 % weight by weight (w/w) shall provide the recipient of the article with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance.

We hereby declare that we comply with the obligation according to Article 33 of the REACH regulation and inform our customers which “substances of very high concern” (SVHC) above the limit value of 0.1% are contained in our products according to the latest state of knowledge.

3. POP – Declaration according to (EU) 2019/1021

Regulation (EU) 2019/2021 about persistent organic pollutants (POP) deals with the protection of the human health and the environment against these substances by a preferably early elimination of production or accordingly by the limitation to a minimum regarding manufacturing, placing on the market and usage of these substances. Furthermore, the regulation defines provisions about waste which consist of these substances, in which these substances are contained, or which are contaminated by these substances. We hereby declare that the products manufactured, processed or traded by



COSEL do not contain any persistent organic pollutants as defined in regulation (EU) 2019/2021.

We will continue to track updates of prohibited and restricted substances listed in the POPs Regulation to achieve continuous conformity.

4. Per- and polyfluoroalkyl substances (PFAS)

Some per- and polyfluoroalkyl substances (PFAS) are already restricted or banned under regulations such as the Persistent Organic Pollutants (POP) Regulation and the REACH Regulation. COSEL products do not contain PFAS that are subject to these regulations, including, for example, PFOA, PFHxS, PFOS, as well as their salts, related substances and derivatives, and long-chain perfluorocarboxylic acids (LCPFCA).

On the other hand, with respect to PFAS that are not currently subject to regulatory restrictions, there may be cases where sufficient information is not available to determine whether such substances are used in COSEL products. The company will provide information based on available knowledge to the extent possible.

5. California Proposition 65 (CP65)

California Proposition 65 (short: CP65), officially known as the Safe Drinking Water and Toxic Enforcement Act of 1986, was established in November 1986. The proposition helps to protect the state's drinking water sources from being contaminated with chemicals known to cause cancer, birth defects or other reproductive harm ("Proposition 65 Substances") and requires businesses to inform Californians about exposures to Proposition 65 Substances.

We hereby declare that certain components in our products contain lead (elemental or in compound form; refer to the REACH statement), nickel (CAS No. 7440-02-0), and/or phthalates, among other substances listed on the current California Proposition 65 Substances List.

6. Toxic Substances Control Act (TSCA)

As required under the Toxic Substances Control Act (TSCA), US Code of Federal Regulations title 40, part 751 - US Toxic Substances Control Act, as amended by the Frank R. Lautenberg Chemical Safety for the 21st Century Act, the Environmental Protection Agency (EPA) issued five final rules on January 6, 2021 to reduce exposures to certain chemicals that are persistent, bioaccumulative and toxic (“PBT”). These chemicals build up in the environment over time and may result in potential risk to exposed populations, including the general population, consumers and commercial users, and susceptible subpopulations. The Rules limit or prohibit the manufacture (including import), processing, and/or distribution in commerce (including within articles) of the following PBT substances:

<u>Substance</u>	<u>knows as</u>	<u>CAS -Reg.-No.</u>
Decabromodiphenyl ether	DecaBDE	1163-19-5
Phenol, isopropylated phosphate (3:1)	PIP (3:1)	68937-41-7
2,4,6-Tris(tert-butyl)phenol	2,4,6-TTBP	732-26-3
Hexachlorobutadiene	HCBD	87-68-3
Pentachlorothiophenol	PCTP	133-49-3

We hereby declare that there are no of the mentioned PBT substances in the products, fabricated, processed or traded by COSEL.

COSEL continuously monitors global regulatory developments related to environmental substance regulations, including RoHS, REACH, POP, PFAS, California Proposition 65 and TSCA, and will review this statement as necessary.

The statements to RoHS, REACH, POP, PFAS, CP65 and TSCA are mainly based on the information given by the manufacturer, their suppliers and our suppliers.



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