

CHT UK Bridgwater Limited, Showground Road Bridgwater, Somerset. TA6 6AJ United Kingdom

23<sup>rd</sup> January 2024

# **Restricted Substances Declaration**

# RoHS, RoHS II and RoHS III (EU Directive 2015/863), PFOA, PFOS, POP, PFAS and Phthalate Derivatives

The Restriction of Hazardous Substances (RoHS) directive is designed to restrict the levels of certain hazardous substances in electrical and electronic equipment. The E.U, (see document L174/88 publishing directive 2011/65/EC, 8<sup>th</sup> June 2011 and EU 2015/863 published), has defined the maximum concentration values, of each restricted substance, please see below. "For the purpose of RoHS regulations, a maximum concentration value of up to 0.1% by weight in homogenous materials for lead, mercury, hexavalent chromium, PBE and PBDE and of up to 0.01% by weight in homogenous materials will be permitted in the manufacture of new EEE (electrical and electronic equipment)"

"Homogenous material" is defined as "a material that can not be mechanically disjointed into different materials". Within the guidance document the term "homogenous" is understood as "of uniform composition throughout".

Restricted Substance	% Maximum Concentration Value by Weight (As defined by EU directive 2015/863)
Pb (lead)	<0.10
Hg (Mercury)	<0.10
Cr VI (Hexavalent Chromium)	<0.10
Cd (Cadmium)	<0.01
PBB (polybrominated biphenyl	s) <0.10
PBDE (polybrominated dipheny	/l ether <0.10
Deca BDE (Decabromodipheny	l ether) <0.10
DEHP (Bis (2-ethylhexyl) phtha	late) <0.10
BBP (Butyl benzyl phthalate)	<0.10
DPB (Dibutyl phthalate)	<0.10
DIPB (Diisobutyl phthalate)	<0.10

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We certify that no phthalates are intentionally introduced during the manufacturing process of our products. Therefore, phthalates are not expected to be present except for trace amounts from incidental environmental contamination

Additional substances not present in CHT UK Bridgwater Limited products include:

Substance	%	
Toluene		<0.10
Trichlorobenzene		<0.10
HBCDD (Hexabromocyclododecane		<0.10

Regulation (EU) No 2017/1000<sup>1</sup> Annex XVII entry 68

Substance	Concentration, ppb
PFOA (Perfluorooctanoic acid) or its sal	ts <25
and PFOA related substances	

Regulation (EC) No 850/2004

Substance	Concentration, %
PFOS (Perfluorooctane Sulphonates)	<0.005
and its derivatives	

Regulation (EU) 2019/1021 on Persistent Organic Pollutants (POP) Substances listed in POP regulation are **not** used in any CHT UK Elastomer products.

PFAS (Per- and polyfluoroalkyl substances) are <u>not</u> used in formulation and manufacture of any products made by CHT UK Bridgwater. For more information on PFAS please refer to <u>Per- and</u> <u>polyfluoroalkyl substances (PFASs) - ECHA (europa.eu)</u>

#### Flame Retardants

BFR (Brominated Flame Retardants, CFR (Chlorinated Flame Retardants) and PVC (Poly Vinyl Chloride) are **not** used in any CHT UK Elastomer products.

Please accept this statement as confirmation that products supplied by CHT UK Bridgwater Limited does not contain any of the above, restricted substances at levels above the maximum permitted concentration or any other brominated compounds.

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#### GB/T 30512-2014 Prohibited and Restricted Substances for Automobiles

On April 28, 2017, The Science and Technology Division of the Ministry of Industry and Information Technology of China began to openly solicit the opinion of the public about six projects that are planned to be upgraded to mandatory national standard, which includes the *Requirements for Prohibited Substances on Automobiles*, and the comment collection will come to an end on May 28, 2017.

The mandatory national standard, *Requirements for Prohibited Substances on Automobiles*, which is applying for approval, is intended to be amended on the basis of the existing recommended national standard *Requirements for Prohibited Substances on Automobiles* (GB/T 30512-2014), and to be upgraded to a mandatory national standard after the amendment. This project is in the charge of the Equipment Industry Division of the Ministry of Industry and Information Technology of China, and supervised by National Technical Committee of Auto Standardization, expecting to be completed in 2020. Besides, organizations such as Chery Automobile Co., Ltd. and China Automotive Technology & Research Centre are the main unit in drafting this standard.

The current *Requirements for Prohibited Substances* (GB/T 30512-2014) stipulates the forbidden substances of the entire vehicles and their components that are used in China, aiming at banning domestic automobile manufacturer and import agent from using lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls and poly brominated diphenyl ethers in developing, manufacturing, importing and selling sections of automotive products.

The prohibited substances required in this standard refer in particular to the following six substances:

Lead or its compounds

Mercury or its compound

Cadmium or its compounds

Hexavalent chromium

polybrominated biphenyls (PBBs)

Poly brominated diphenyl ethers (PBDEs)

Content limitations of prohibited substances:

Except the automotive components and materials with a time-limited exemption, the mass percentages of lead, mercury, hexavalent chromium, polybrominated biphenyls and poly brominated diphenyl ethers in every homogeneous material of the entire vehicles and their components should not exceed 0.1%, and the mass percentage of cadmium should be below 0.01%

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# Directive 2000/53/EC – End of Life Vehicles

In order to promote the prevention of waste Member States shall encourage, in particular: (a) vehicle manufacturers, in liaison with material and equipment manufacturers, to limit the use of hazardous substances in vehicles and to reduce them as far as possible from the conception of the vehicle onwards, so as in particular to prevent their release into the environment, make recycling easier, and avoid the need to dispose of hazardous waste; (b) the design and production of new vehicles which take into full account and facilitate the dismantling, reuse and recovery, in particular the recycling, of end-of life vehicles, their components and materials; (c) vehicle manufacturers, in liaison with material and equipment manufacturers, to integrate an increasing quantity of recycled material in vehicles and other products, in order to develop the markets for recycled materials. 2. (a) Member States shall ensure that materials and components of vehicles put on the market after 1 July 2003 do not contain lead, mercury, cadmium or hexavalent chromium other than in cases listed in Annex II under the conditions specified therein;

### https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02000L0053-20130611&gid=1405610569066&from=EN

Please accept this statement as confirmation that products supplied by CHT UK Bridgwater Limited does not contain any of the above, restricted substances at levels above the maximum permitted concentration and / or are exempt from article 4(2)(a).

# <u>REACH</u>

#### EU REACH

We confirm that the substances within the materials supplied to your company have an EU REACH registration by a legal entity based in the EU-27 prior to the end of the transition period of 31<sup>st</sup> December 2020 and that any shipment of products containing your materials from the United Kingdom to the EU-27 would be considered a re-import.

As of 31<sup>st</sup> December 2020, from 11:00 pm GMT, the UK have exited the transition period. For CHT UK Bridgwater Limited products imported into the EU27 and EEA, we have authorized CHT Germany GmbH to act as our Only Representative (OR) to ensure that the imported substances are registered in accordance with the REACH Directive (EC) No. 1907/2006.

#### UK REACH

We confirm that we have submitted a Downstream User Import Notification (DUIN) to the UK Health and Safety Executive (HSE) before its due date on 27<sup>th</sup> October 2021. The submitted notification allows us to continue uninterrupted imports from the EU and diverts our UK Reach registration obligations for now extended deadlines of October 2026, October 2028 and October 2030 respectively, depending on the import tonnage quantities and hazard classification of the substance.

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# Substances of Very High Concern (SVHC) Candidate List

The ECHA frequently updates candidate list of Substances of Very High Concern (SVHC), the updated list can be viewed at:

### https://echa.europa.eu/candidate-list-table

The above was last updated on the 23<sup>rd</sup> of January 2024 and now contains 240 substances.

We, as a supplier are legally obliged to inform our customers of any SVHC used at levels of 0.1% and above by weight. Some products supplied by CHT UK Bridgwater Ltd do contain SVHC's listed on the candidate list at levels of >0.1% by weight. These substances are commonly known as D4, D5 and D6 cyclic siloxanes (octamethylcyclotetrasiloxane, decamethylcyclopentasiloxane and dodecamethylcyclohexasiloxane). The concentration of these SVHC's are given in section 3 of the individual product safety data sheets. Restrictions relating to the product or contained substances pursuant to Annex XVII to EC Regulation 1907/2006 and substances in the candidate list (Article 59 REACH) can be found in section 15 of the product safety data sheet.

# California Proposition 65 Declaration

With regards to the California Prop 65 listing:

# https://oehha.ca.gov/proposition-65/proposition-65-list

Please see section 15 of the relevant safety data sheet in accordance with U.S.A Federal Hazcom 2012 for any substances listed under the California Proposition 65 act. Please request a safety data sheet in compliance with USA Federal Hazcom 2012 from <a href="mailto:info.uk@cht.com">info.uk@cht.com</a>

Please note that products supplied by CHT UK Bridgwater Limited do not contain the three substances added to the list on January 27<sup>th</sup> 2023 1-Bromo-3-chloropropane (CAS 109-70-6) 1-Butyl glycidyl ether (CAS 2426-08-6) Glycidyl methacrylate (CAS 106-91-2)

#### **Conflict Minerals**

In 2010, the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act was passed concerning "conflict minerals" originating from the Democratic Republic of the Congo (DRC) or adjoining countries. The SEC published final rules associated with the disclosure of the source of conflict minerals by U.S. publicly traded companies (see the rules at http://www.sec.gov/rules/final/2012/34-67716.pdf). The rules reference the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, (http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf), which guides suppliers to establish policies, due diligence frameworks and management systems.

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In 2017, Regulation (EU) 2017/821 of the European Parliament and of the European Council of 17 May 2017 was passed concerning supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and highrisk areas (see regulation at:

### https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L:2017:130:FULL&from=EN

CMRT reporting and declaration documents are available from CHT UK Bridgwater Limited, please contact <u>info.uk@cht.com</u> and we can provide a completed declaration or upload a completed declaration to the compliance portal of your choice.

### International Material Data System (IMDS)

The IMDS (International Material Data System) is the automobile industry's material data system. Initially, it was a joint development of Audi, BMW, Daimler, DXC, Ford, Opel, Porsche, VW and Volvo. Further manufacturers have meanwhile joined the community and IMDS has become a global standard used by almost all of the global OEMs. Talks are being held with further manufacturers regarding their participation in IMDS. In IMDS, all materials used for automobile manufacturing are collected, maintained, analyzed and archived. Using the IMDS, it is possible to meet the obligations placed on automobile manufacturers, and thus on their suppliers, by national and international standards, laws and regulations.

Please contact <u>monika.baginska@cht.com</u> for IMDS data sheets. Please ensure that both, the recipient's IMDS company ID number and recipient's internal material number is provided, and the data will be sent securely by use of the IMDS portal.

# **Dual Use Declaration**

We undersigned declare that CHT UK Bridgwater Limited products are designed to be industrial, commercial or residential system components. Our products are clearly NOT deemed to be inherently military in character and are not included in the list of dual use items and technologies referred to in Council Regulation (EC) No 1334/2000 and its amendment Council Regulation (EC) No 1183/2007.

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32000R1334 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32007R1183

CHT products originating in the USA and resold by CHT Bridgwater UK Limited are neither EAR99 classified, nor require an ECCN (Export Control Classification Nr.).

# https://www.bis.doc.gov/index.php/regulations/export-administration-regulations-ear

CHT UK Bridgwater Limited products neither fall under ITAR (International Traffic in Arms Regulations) restrictions, nor under the Wassenaar Arrangement on export controls for conventional arms and dual-use goods and technologies.

It is not the duty of CHT UK Bridgwater Limited to extend its control over additional treatment or final use of products. CHT UK Bridgwater Limited customers must ensure themselves that their commerce complies with all applicable regulations.

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#### Animal Substances

All the products manufactured at CHT UK (Bridgwater) Limited are manufactured completely from synthetic or manufactured raw materials and do not contain, nor ever did, any raw materials produced from or substances derived from animal origin. The manufacturing processes do not use any ingredient of animal origin, nor do any of the products manufactured at CHT UK (Bridgwater) Limited come in contact with any animal products during storage and transportation.

All the products manufactured at CHT UK (Bridgwater) Limited are free of Bovine Spongiform Encephalopathy (BSE) and Transmissible Spongiform Encephalopathy (TSE).

#### **TSCA Listed Substances**

We confirm that elastomer products supplied by CHT UK Bridgwater Limited contain substances that are **listed on** the TCSA inventory and <u>do not</u> contain any of the below banned substances under the US Toxic Substances Control Act updated on the 3<sup>rd</sup> March 2021:

PIP (3: 1) (Phenol, isopropylated phosphate (3: 1), CAS No. 68937-41-7). DecaBDE (decabromodiphenyl ether, CAS No. 1163-19-5) 2,4,6 TTBP (2,4,6-tris (tert-butyl) phenol, CAS No. 732-26-3) HCBD (hexachlorobutadiene, CAS No. 87-68-3) PCTP (pentachlorothiophenol, CAS No. 133-49-3)

Yours faithfully

Sean Stoodley Director of Technology Material Solutions

#### We reserve the right to modify the product(s) and technical documentation.

Our technical advice and recommendations given verbally, in writing or by trials are believed to be correct. They are neither binding with regard to possible rights of third parties nor do they exempt you from your task of examining suitability of our products for the intended use. We cannot accept any responsibility for application and processing methods which are beyond our control.

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