

Material Compliance



September 2022

General Company Information

It is the aim and obligation of congatec Group to develop and manufacture environment-friendly products that fulfill applicable regulations, such as the Directive 2011/65/EU including the amendment Directive 2015/863/EU for the Restriction of Hazardous Substances (RoHS) or the Directive 2012/19/EU regarding the Waste of Electrical and Electronic Equipment (WEEE).

The members of the European Union implement these directives according to their own strategies using local regulations. That is the reason for many different laws and provisions within the different countries of the EU. Countries that do not belong to the EU such as China, Japan and the USA have established regulations similar to RoHS in order to restrict the use of hazardous substances and to create environmentally friendly products. We are open to check requirements for these regulations on a case-by-case basis.

Product Design and Manufacturing

All congatec products are designed and manufactured according to the current valid European Union regulations/ directives. The respective requirements for the material selection are considered in the early project phase and ensured during the lifetime of the product.

All congatec's Contract Manufacturing Service partners are legally obligated to fulfill the material compliance requirements for purchased materials for the product and for the processes during production. The evidence of the material conformity must be declared.

Material Compliance Declarations

Material declarations are provided upon request for all products according to the valid legislation of the European Union which is listed on the next pages. Declarations are based on the information we receive from our manufacturers and suppliers which are believed to be true and accurate and congatec Group also takes reasonable steps to validate the information it provides to its customers. All declarations provided are based on congatec's current state of knowledge and issued "as is" and may be subject to change at any time due to technical requirements and continuing development without prior notification.

Declarations are provided in the form of PDF documents and Full Material Declarations are not available for congatec products. Furthermore, congatec Group cannot and will not enter or maintain compliance data in various customer tools.

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RoHS

The RoHS Directive 2011/65/EU was first published in February 2003 by the European Union and took effect July 1, 2006. This initial RoHS directive limited the use of six dangerous substances frequently used in electronic products, equipment and its manufacturing processes and the amendment Directive 2015/863/EU added 4 additional substances. The requirements of the directives 2011/65/EU and 2015/863/EU are implemented in our development processes as well as clarified with our contract manufacturers. The declaration of RoHS compliance is based on part numbers. RoHS is also checked and declared for revision updates of our products on request. A declaration of RoHS compliance explicitly states the exemptions which are relevant for the product.

REACH

Declarations of compliance with the European Union Regulation (EC) No 1907/2006 (REACH) are based on part numbers. According to article 59, paragraph 10, the European Chemicals Agency (ECHA) publishes the Candidate List of Substances of Very High Concern (SVHC) on its homepage and the candidate list is updated approximately every 6 months during which all BOM items of congatec products are checked. All deliveries after the publishing date of the new candidate list are considered.

In case our state of knowledge changes and a product is affected by SVHCs, the corresponding customers will be informed immediately.

POP

Persistent Organic Pollutants (POPs) are different classes of chemicals which remain in the environment for extended periods of time, accumulate in living organisms and therefore pose a health and safety risk not only for humans but also for the entire environment. Compliance with the Regulation (EU) 2019/1021 on Persistent Organic Pollutants are declared for congatec GmbH products upon request and the declarations also cover the chemicals proposed as POPs.

Proposition 65

The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65) is a Californian Law aiming at the protection of drinking water sources from certain chemicals. It requires manufacturers to provide information on chemicals listed by the California Office of Environmental Health Hazard Assessment (OEHHA) because they are known to cause cancer or birth defects or other reproductive harm. A Proposition 65 declaration can be provided upon request free of charge.

TSCA

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The Toxic Substances Control Act (TSCA) as a United States Law regulates the introduction of new as well as existing chemicals and the TSCA inventory lists all currently existing chemical substances manufactured, processed, or imported in the United States. In December 2020, the Environmental Protection Agency (EPA) limited or prohibited the manufacture and import, the processing and/or distribution in commerce of persistent, bioaccumulative and toxic (PBT) chemicals under TSCA which are 5 classes of chemicals. A TSCA declaration can be provided upon request free of charge.

Montreal Protocol

To protect the ozone layer, the European Parliament put into force regulations which, based on the Montreal Protocol from 1987, regulate the import, export and use of substances depleting the ozone layer (ozone-depleting substances, ODS). The Montreal Protocol is an international treaty designed to protect the ozone layer by phasing out the production of numerous substances that are responsible for ozone depletion and a corresponding declaration can be provided upon request free of charge.

Conflict Minerals

The Conflict Minerals Reporting Template (CMRT) is used to convey information across the supply chain regarding the origin of the metals Tin, Tantalum, Tungsten & Gold. In 2010, the Congress of the United States passed the "Dodd-Frank Wall Street Reform and Consumer Protection Act" (Dodd-Frank Act) which defined the four minerals as well as the extraction ores as conflict minerals and requires the reporting of the use and sourcing. Every year, all relevant information is collected to evaluate the conflict minerals that will be used for the congatec products. The resulting report will be provided on request as soon as a reasonable amount of data is available. This is a free of charge service provided by congatec Group to its customers.

Registration Numbers

The Directive 2012/19/EU regarding the Waste of Electrical and Electronic Equipment (WEEE), which targets the recycling of electronics after the return to the manufacturer, was transposed into German national law in the *ElektroG*. Congatec is registered at the responsible authority EAR and the registration number is *DE 92528090*. Furthermore, congatec GmbH assumes responsibility for the disposal of the batteries on our products and is part of a corresponding disposal system. The registration number at EAR for the *BattG* is *DE 40896644*. In order to comply with the *VerpackG*, congatec GmbH is registered at the packaging register LUCID under the number *DE5864479065367*.

CE

congatec products are tested and marked according to CE requirements to ensure conformity

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with the essential health and safety requirements. Although it is not mandatory to share the DoC with customers, the CE declaration can be provided for each product group on request.

UL

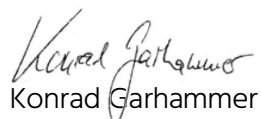
congatec products are not UL-listed. congatec uses UL-recognized components that are relevant in order to UL-list customer's products, e.g. connectors. congatec Group will provide this information on request for any congatec product. This information is based on a product group and not specific for product part numbers.

Letter of Volatility

The letter of volatility can be provided, on request, for the onboard memories used on congatec products. The letter of volatility is issued based on the part numbers of congatec products.

If you have any questions on the topics described above, please do not hesitate to direct them to the responsible congatec sales representative or directly to the compliance team under Material-Compliance@congatec.com.

Sincerely,


Konrad Garhammer
CTO


Daniel Jürgens
CFO