

Material Compliance



July 31, 2026

General Company Information

It is the objective and commitment of congatec GmbH to develop and manufacture environmentally friendly products that comply with all applicable environmental legislation, such as Directive 2011/65/EU on the Restriction of Hazardous Substances (RoHS), as amended by Commission Delegated Directive (EU) 2015/863 and Directive 2012/19/EU on Waste Electrical and Electronic Equipment (WEEE).

The European Union Member States implement these directives through national legislation. Consequently, specific legal requirements and administrative provisions may vary between countries while maintaining the common objectives established by EU legislation. In addition, several countries and regions outside the European Union, including China, Japan and the United States, have established legislation comparable to the EU RoHS Directive to restrict hazardous substances in electrical and electronic equipment. Compliance with such requirements can be evaluated on a case-by-case basis.

Product Design and Manufacturing

All congatec products are designed and manufactured according to the applicable European Union legislation. The respective requirements for material selection are considered in the early project phase and maintained throughout the product lifecycle.

All congatec's Contract Manufacturing Service partners are contractually required to comply with the material compliance requirements for purchased materials used in the product and production processes. Suppliers are required to provide documented evidence demonstrating material compliance.

Material Compliance Declarations

Material compliance declarations are based on information provided by our manufacturers and suppliers. congatec GmbH takes reasonable measures to assess and validate the information received. Declarations are provided in good faith based on the information available to congatec GmbH at the date of issuance and reflect its current state of knowledge. Declarations may be revised without prior notice if new technical information or regulatory changes become available.

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Material compliance declarations are provided as PDF documents and Full Material Declarations (FMDs) are not provided for congatec products. Furthermore, congatec GmbH does not enter or maintain compliance data within customer-specific compliance portals or third-party databases.

RoHS

The RoHS Directive 2011/65/EU was adopted in February 2003 by the European Union and took effect July 1, 2006. This initial RoHS directive limited the use of six hazardous substances frequently used in electronic products, equipment and manufacturing processes, and the amendment Directive 2015/863/EU added four additional substances. The requirements of the directives 2011/65/EU and 2015/863/EU are implemented in congatec GmbH's development processes and communicated to and fulfilled by its contract manufacturing partners. RoHS declarations are issued at product level. Upon request, RoHS compliance can also be evaluated and declared for product revisions. Each declaration identifies any applicable RoHS exemptions relevant to the product.

REACH

Declarations of compliance with the European Union Regulation (EC) No 1907/2006 (REACH) are based on part numbers. In accordance with Article 59, paragraph 10, the European Chemicals Agency (ECHA) publishes the Candidate List of Substances of Very High Concern (SVHC), which is typically updated twice per year. Following each update, all bill of material (BOM) components are re-evaluated against the revised Candidate List. REACH declarations reflect congatec GmbH's current state of knowledge at the date of issuance and are available upon request.

PFAS

Per- and polyfluoroalkyl substances (PFAS) comprise a large group of fluorinated chemicals that are subject to increasing regulatory scrutiny worldwide. congatec GmbH continuously monitors applicable legislation and works closely with its manufacturers and suppliers to obtain relevant material composition information. PFAS declarations are based on information provided by our manufacturers and suppliers and reflect congatec GmbH's current state of knowledge at the date of issuance. PFAS declarations can be provided at product level upon request for applicable products.

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POPs

Persistent Organic Pollutants (POPs) are a group of chemicals which remain in the environment for extended periods of time, accumulate in living organisms and may pose risks to human health and the environment. Product-level declarations confirming compliance with the Regulation (EU) 2019/1021 on Persistent Organic Pollutants (POPs) are available upon request and cover proposed POP substances where applicable.

Proposition 65

The Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65) is a California law intended to protect drinking water sources from certain chemicals. It requires manufacturers to provide information on chemicals identified by the California Office of Environmental Health Hazard Assessment (OEHHA) as causing cancer, birth defects or other reproductive harm. A product-level Proposition 65 declaration can be provided upon request.

TSCA

The Toxic Substances Control Act (TSCA), a United States law, regulates the manufacture, processing, distribution and import of chemical substances in the United States. In December 2020, the Environmental Protection Agency (EPA) issued restrictions under TSCA limiting or prohibiting the manufacture, import, processing and/or distribution in commerce of persistent, bioaccumulative and toxic (PBT) chemicals, covering five PBT substances. A product-level TSCA declaration can be provided upon request.

Montreal Protocol

Ozone-depleting substances (ODS) are regulated under the Montreal Protocol and the corresponding European Union legislation governing substances that deplete the ozone layer. A product-level declaration confirming compliance with the applicable ODS requirements is available upon request.

Conflict Minerals

The Conflict Minerals Reporting Template (CMRT) is used to communicate information across the supply chain regarding the sourcing of the minerals tin, tantalum, tungsten and gold (3TG). In 2010, the United States Congress passed the "Dodd-Frank Wall Street Reform and Consumer Protection Act" (Dodd-Frank Act), which established reporting requirements regarding the use, sourcing and origin of these conflict minerals. Relevant supplier information is collected to evaluate the sourcing of conflict minerals used in congatec products.

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Product-level Conflict Minerals Reporting Templates (CMRTs) are available upon request following completion of the due diligence process and availability of sufficient supplier information.

Registration Numbers

The Directive 2012/19/EU on Waste Electrical and Electronic Equipment (WEEE) is implemented in Germany through the ElektroG. congatec GmbH is registered with the responsible authority EAR and the registration number is *DE 92528090*. Furthermore, congatec GmbH fulfils its producer obligations regarding the disposal of batteries contained in its products and participates in a corresponding disposal system. The registration number at EAR for the *BattDG* is *DE 40896644*. In order to comply with the *VerpackDG*, congatec GmbH is registered in the packaging register of the ZSVR under the number *DE5864479065367*.

CE

congatec products are designed and tested in accordance with the relevant European Union legislation. Where applicable, products are CE marked to demonstrate conformity with the applicable essential health, safety and environmental protection requirements. EU Declarations of Conformity (DoCs) are maintained by congatec GmbH and are available upon request for the applicable product families.

UL

congatec products are not UL-listed as complete end products. However, congatec products incorporate UL-recognized components where applicable, which may support customers in obtaining UL certification for their own end products. Information regarding the UL-relevant components is available for each product family upon request and is not provided on an individual part number basis.

Letter of Volatility

A Letter of Volatility (LoV) is available for the onboard memory devices used in congatec products. The Letter of Volatility identifies the applicable memory technologies and is available upon request for the relevant congatec product part number.

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If you have any questions regarding the topics addressed in this document, please contact your responsible congatec sales representative or the Material Compliance team at Material-Compliance@congatec.com.

Sincerely,

Signiert von:

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Dr. Dominik Reißing
CEO

Signed by:

659A19424B26489

Konrad Garhammer
COO & CTO