

INVENTRONICS (HANGZHOU) Inc.

Declaration of Conformity: Substances in Products

Legal Requirements and Standards for the market

Declaration Scope:

Products of INVENTRONICS (HANGZHOU) Inc.

Placing on the market of products is subject to specific regional (such as the EU/ North America) or national legal requirements. For example in the EU, these legal requirements are defined in EU-Regulations which are directly enforceable in the Member States or in EU Directives which require a transformation into Member States' national legal systems. Compliance with the applicable legal requirements is obligatory for every party putting products on the EU Market. Therefore, INVENTRONICS bears responsibility.

The following Directives and Regulations restrict the use of hazardous substances in products and packaging:

- **Directive 2011/65/EU ("RoHS")**
(see also https://ec.europa.eu/environment/topics/waste-and-recycling/rohs-directive_en
RoHS conformity is also part of the below mentioned CE labelling scheme)
- **Regulation (EU) 2025/40 ("Packaging and Packaging Waste Regulation – PPWR")**
Replaces Directive 94/62/EC from 12 August 2026; restricts the sum of Pb, Cd, Hg and Cr(VI) in packaging to 100 mg/kg.
- **Regulation (EC) No 1907/2006 ("REACH")** including declaration of "Substances of Very High Concern" and restriction of certain substances
- **Regulation (EU) 2019/1021 (Persistent Organic Pollutants, POP)** and subsequent amendments:
 - Commission Delegated Regulation (EU) 2023/1608 (30-May-2023): amends Annex I of (EU) 2019/1021, adding perfluorohexane sulfonic acid (PFHxS), its salts and related compounds
- **Directive 2008/98/EC (Waste Framework Directive)** incl. amendment EU 2018/851 referring to the SCIP database (Substances of Concern in Products) of the European Chemical Agency (ECHA)
- **Ozone-Depleting Substances (ODS)**
Controlled under the Montreal Protocol, Regulation (EC) No 1005/2009 and the U.S. Clean Air Act (e.g. CFCs, HCFCs, halons, methyl bromide)
- **U.S. Toxic Substances Control Act (TSCA)**
Regulates chemical substances and mixtures, including the section 6(h) PBT rules
- **California Proposition 65 (CP65)**
California Safe Drinking Water and Toxic Enforcement Act of 1986 (Health & Safety Code sec. 25249.5 et seq.)

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INVENTRONICS (HANGZHOU) Inc. declares:

- Products, put in the EU/ North America Market today and in the future by any of the subsidiaries of Inventronics (Hangzhou) Inc., satisfy the relevant applicable legal requirements.
- Compliance to applicable legal requirements is ensured through systematic feedback from our partners and suppliers, rigorous utilization of our processes, laboratories and integrated tools that manage pertinent information of products, parts and materials procured from suppliers.
- According to Directive 2011/65/EU ("RoHS") including amendment of Annex II (2015/863/EU), INVENTRONICS (HANGZHOU) Inc. products delivered into EU market do not contain the following substances exceeding defined maximum concentration values, unless in an application exempted by Annex of RoHS Directive (incl. amendments).

Substances / application	Maximum concentration values by weight in homogeneous materials
Lead (Pb)	0.1 %
Mercury (Hg)	0.1 %
Cadmium (Cd)	0.01 %
Hexavalent chromium (Cr ⁶⁺)	0.1 %
Polybrominated biphenyls (PBB) Polybrominated diphenyl ethers (PBDE)	0.1 %
Bis(2-ethylhexyl) phthalate (DEHP)	0.1 %
Benzyl butyl phthalate (BBP)	0.1 %
Dibutyl phthalate (DBP)	0.1 %
Diisobutyl phthalate (DIBP)	0.1 %

- According to the REACH Regulation the Candidate List of substances of very high concern (**253 SVHC**) is published by ECHA (European Chemicals Agency). As required by Article 33 Inventronics (Hangzhou) Inc. will inform customers, if certain products or its packaging contain one or more of these substances in a concentration exceeding 0.1% weight per article, as soon as we become aware of the fact. The relevant substance requirements also apply to UK REACH. More information can be found under <https://echa.europa.eu/de/candidate-list-table>
- In full accordance to the European Waste Framework Directive (including its Amendment (EU) 2018/851), Inventronics (Hangzhou) Inc. is declaring products containing SVHC in the [SCIP database of ECHA](#). In most cases the EAN10 is the Primary Article Identifier. Inventronics' products can contain the SVHC Lead (EC 231-100-4, CAS 7439-92-1). Unless otherwise stated, these products are safe for use and require no special precautions. The use of lead is restricted by RoHS Directive (2011/65/EU) and allowed in exempted applications according to Annex III.
- Inventronics will carefully monitor the legislation process for PFAS irrespective of the market and will take every necessary measure to fulfil upcoming legal requirements for products, processes and production equipment. PFAS is subject to multiple regulatory frameworks, which have not yet been fully implemented.

For more information please visit our Sustainability webpage: <https://www.inventronics-light.com/sustainability>

or contact your respective Inventronics Sales representative.



The information provided in this statement represents our knowledge and belief as of the date that it is provided. We base our knowledge and belief on information provided by third parties and make no representation or warranty as to the accuracy and shall have no liability for the consequences of use of such information. We have taken and continue to take reasonable steps to provide representative and accurate information but may not have conducted destructive testing or chemical analysis on incoming materials and chemicals. We and our suppliers consider certain information to be proprietary, and thus CAS numbers and other limited information may not be available for release.