

Date: 09.05.2025	<b>Declaration of Conformity</b>	 <b>KUNDISCH</b> A Phoenix Mecano Company
Revision: 01-2025		

## **Regulation 2011/65/EU (RoHS II) and (EU) 2015/863 (RoHS III)**

Either the following substances are not used as input materials or additives, or the maximum permissible concentrations are complied with.

- Lead (0.1 %)
- Mercury (0.1%)
- Cadmium (0.01%)
- Chromium VI (0.1 %)
- Polybrominated biphenyls PBB (0.1 %)
- Polybrominated diphenyl ethers PBDE (incl decaBDE, octaBDE, pentaBDE) (0.1 %)
- Di-2-ethylhexyl phthalates /DEHP (0.1 %)
- Butyl benzyl phthalates / BBP (0.1 %)
- Dibutyl phthalates / DBP (0.1 %)
- Diisobutyl phthalates / DIBP (0.1%)

### **1. Enclosure materials for enclosure our sister Company BOPLA**

All materials and accessories used for BOPLA enclosures already satisfy the requirements of the RoHS II and RoHS III.

Special designs with EMC copper conductive lacquer, aluminium or CrNi vacuum coating do not contain prohibited materials.

### **2. Membrane keypads / System solutions**

All Kundisch front membranes, membrane keypads using conductive silver technology and copper-clad front membranes without connectors, soldered LEDs, electronic components and displays conform to the RoHS as of manufacturing date **January 1, 2005**. Membrane keypads using conductive silver technology and LEDs also satisfy the requirements of the RoHS.

As of **October 1, 2005**, all soldering processes involving the fitting of membrane keypads with LEDs, electronic components and displays on PCBs and polyester base membranes can be carried out lead-free in conformity with the RoHS.

The pre-condition for manufacture in conformity with the RoHS is that the electronic components specified by the customer conform to the RoHS for lead-free fitting.

In the case of new and repeat orders involving existing constructions / designs, it is the customer's responsibility to establish whether lead-free fitting with electronic components which conform to RoHS is required and whether these components are available.

In the case of a conversion requested by the customer (alteration, re-design), release samples for release testing are required following agreement.

## **Lead (Pb, CAS no.: 7439-92-1 )**

In the RoHS Directive 2011/65/EU there are exceptions to the use restriction of lead in Annex III 6a (lead as an alloying element in steel), 6b (lead as an alloying element in aluminium), 6c (lead as an alloying element in copper).

We hereby inform you about the use of lead as an alloying element in a concentration of more than 0.1% in: 6a) Components made of free machining steel, which could have a lead content of more than 0.1% due to production and 6c) all copper alloys, in particular brass.

All aluminium profiles, aluminium sheets, aluminium die-cast parts and zinc die-cast parts have a lead content of less than 0.1% and are not affected by this.

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## **Per- and polyfluoroalkyl substances (PFAS)**

### **Background/proposal for the restriction of PFAS:**

The European Chemicals Agency (ECHA) published a dossier on the comprehensive restriction of perfluorinated and polyfluorinated alkyl substances (PFAS) on March 22, 2023 and launched the public consultation (restriction dossier ECHA). The restriction aims to restrict or ban the production, placing on the market and use of all PFASs on their own or in mixtures and articles.

The restriction proposal on PFAS has since attracted a great deal of public attention.

### **There is currently no legal obligation to notify or provide information.**

Under the CLP regulation only single PFAS substances are classified in a harmonized way (e.g. PFOS). The REACH Regulation also only regulates some individual PFAS substances.

As part of our legal compliance principle, i.e. compliance with the relevant environmental regulations, we also comply with the associated, relevant regulations (e.g. RoHS, REACH).

To the best of our current knowledge, neither we nor our suppliers knowingly use PFAS in the raw materials, semi-finished products or products  $\geq 1$  ppm that we use.

We have also had various potentially critical products analysed. No concentrations  $\geq 1$  ppm could be detected.

## **PFOS (Perfluorooctane sulfonate)**

The raw materials, semi-finished or finished products which we use contain either no PFOS or do not contain it in amounts which are not permitted above the limits specified in directive (EU) 2019/1021 (POP).

## **PFOA (Perfluorooctanoic acid)**

Our pressure compensation membranes do not contain more than 25 ppb perfluorooctanoic acid (PFOA) (CAS number 335-67-1) including its salts or 1 ppm of one or a combination of substances related to PFOA. Therefore, these products comply with EU PFOA regulations.

## **POP (EU) 2019/1021**

The production, placing on the market and use of substances listed in the POPs Ordinance as such, in preparations or as constituents of articles are prohibited.

We do not manufacture, place on the market or use these substances.

At the present time, we assume that none of these substances are used in our products.


## **PAH (polycyclical aromatic hydrocarbons)**

PAH in accordance with Regulation EC 1272/2013 dated December 6, 2013 regarding the amendment to Annex XVII to Regulation (EC) No. 1907/2006 (REACH)

These compounds are **not** contained in the raw materials which we use to manufacture our products.

## **DMF (biocide dimethyl fumarate)**

In March 2009 the European Commission has prohibited to market products which contain the biocide dimethyl fumarate (DMF) – this regulation started on May 1st, 2009. The concentration of the biocide dimethyl fumarate may now not be higher than 0.1 mg per kg of the product's weight or of parts of the product. These compounds are **not** inside the materials we use.

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## **REACH**

As a "downstream user", we will ensure compliance with all the requirements which affect us in respect both of the REACH regulation and the resulting security with regard to delivery.

All products which we supply are articles within the meaning of the REACH Regulation, and consequently there is no obligation for them to be registered. Kundisch is not compelled to make independent registrations or any activities concerning REACH. The consignees of REACH are the producers and retailers of the polymers primarily.

One important goal of REACH is the safe use of substances and products as well as the passing on of relevant information within the supply chain.

According to current knowledge, our polymers conform to REACH standards and are also listed under REACH. In our own interests, and to ensure product safety, we track the implementation of REACH.

Following the pre-registration phase of the pre-suppliers, we will commence an exchange of information in respect of the users and applications by our customers.

If required, we will contact you in respect of this.

## **REACH**

**Info Absence of SVHC materials according to the list of candidates, article 59.No.1907/2006**

### **REACH**

For our plastic-, aluminium-, polyester-standard enclosures and our cable glands from our sister company BOPLA

#### **We inform you about the use of SVHC >0,1%:**

- Lead (Pb, CAS no.: 7439-92-1) as an alloying element in brass / machining steel.
- 2-(2H-Benzotriazol-2-yl)-4-(1,1,3,3-Tetramethylbutyl)phenol (UV-329), (CAS no.: 3147-75-9) in components made of polycarbonate with UV protection.

Based on current knowledge and previous statements from our suppliers, our sister company BOPLA does not use any polymers that contain substances with a concentration of more than 0.1% by mass according to the list dated **21.01.2025 (247 SVHC's)**.

Although the above-mentioned materials must not be used or added, it is not possible to exclude the possibility that negligible traces caused, for example, by impurities in components used, may be present. Because of the fact that none of the mentioned materials are included under normal circumstances, their absences have not been controlled analytically.

This declaration of conformity applies only to products that have been manufactured with approved by Kundisch materials. Prescribed by client materials are not checked by Kundisch on conformity.

**Separate agreement with us in respect of all customer-specific special designs is absolutely necessary!**

Special designs does not mean Kundisch standard articles which have been processed, assembled or completed with Kundisch-components. This declaration of conformity applies to all these articles in its entirety.

All of the data, recommendations and information from Kundisch or issued in the name of Kundisch concerning the individual products and materials is based on investigations and information of the relevant manufacturer of the material.

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The guideline values for the properties represent non-binding average values that had been determined for the injection-moulded test pieces.

Even when Kundisch regards these as reliable, Kundisch shall accept no liability whatsoever for the accuracy and completeness of the data, recommendations and information.

The passing on of this data, recommendations and information is done without any intention to be legally binding and does not form the basis of a separate contract.

The interested party is required instead to verify for himself the quality and overall properties of our products and their suitability for the intended purpose and shall carry out all the required investigations to this end at his own responsibility if Kundisch has not explicitly guaranteed in writing certain properties or applications of the product.

The same applies accordingly for the other technical information and advice that we give out in word and writing concerning applications.

This declaration was drawn up and published on the basis of the laws and regulations which currently apply and also in accordance with the best of our present knowledge.

This document was prepared electronically and for this reason is valid even if not signed. Copies which are printed out are not subject to updating. The latest version can be found on our website at [www.kundisch.de](http://www.kundisch.de).