

REACH / ROHS / SEC – GENERAL DECLARATION

1. REACH

European regulation REACH: Regulation EC No 1907/2006
Safe handling of chemicals - Registration, Evaluation, Authorisation of Chemicals

The European Chemicals Agency (ECHA) maintains a list of substances for possible inclusion in Annex XIV, directory of substances requiring authorisation (REACH). Processors must know these, particularly concerning substances (SVHCs - Substances of Very High Concern), and are obliged to inform customers if the substance is present in the part in a concentration of 0.1 percent by weight or more (<http://echa.europa.eu/candidate-list-table>).

As a manufacturer of parts, components and assemblies made of metallic materials, ESTECH Industries and its associated companies are "downstream users" within the meaning of the REACH regulation 1907/2006. Obligations due to the manufacture and placing on the market of substances / chemicals for registration (ECHA) do not apply to us.

The products that are supplied by ESTECH Industries and its associated companies are products within the meaning of REACH and, therefore, are not to be defined as a substance or preparation. In addition, no substance is released from our products under normal and foreseeable conditions of use. Consequently, ESTECH Industries and its associated companies are neither subject to the registration requirement nor the obligation to produce safety data sheets.

In order to guarantee our customers a continuous supply of safe products, we ensure that our suppliers meet all requirements with regard to chemical substances and materials and, as such, no substances from the candidate list of concerning substances (SVHC) are used in the manufacture of the products.

2. RoHS

EU-directive RoHS: 2011/65/EU incl. Revisions 2015/863/EU

Restricting the use of certain hazardous substances in electrical and electronic equipment; Extending the limitation of 4 additional substances with adaptation to the 2015/863 edition.

The aim of the regulation is to restrict and limit the use of certain hazardous substances in electrical and electronic equipment.

Extract from the current RoHS directive, limit values:

Substance	Limit value (Volume%)
Lead (Pb)	< 0.1%
Lead as an alloy element in steel	max. 0.35%
Lead as an alloy element in aluminium	max. 0.4%
Lead as an alloy element in copper	max. 4%
Mercury (Hg)	< 0.1%
Cadmium (Cd)	< 0.01%
Chromium VI (Cr6+)	< 0.1%
Polybrominated biphenyl (PBB)	< 0.1%
Polybrominated diphenyl ethers (PBDE)	< 0.1%
Di(2-ethylhexyl) phthalate (DEHP)	< 0.1%
Butyl benzyl phthalate (BBP)	< 0.1%
Dibutyl phthalate (DBP)	< 0.1%
Diisobutyl phthalate (DIBP)	< 0.1%

According to Article 3 (Definitions), para. 6 of EU Directive 2011/65 / EU, a "manufacturer" is any individual person or corporate entity, who manufactures electrical or electronic equipment, or who has electrical or electronic equipment developed or produced, and markets it under their own name or their own brand. Since we do not manufacture or develop any electrical or electronic equipment, we are not considered a manufacturer within the meaning of the directive.

In general, we must adhere to the material specifications given by our customers on the production drawing. Whether the part we produce is used in vehicles or electrical and electronic equipment, or whether it falls under the various exception regulations is usually not possible for us to assess and is the responsibility of our customers.

As a rule, the RoHS-relevant substances for the metals we process come within the defined limit values. The materials 3.0615 and 3.1645 do not, with 1-3% lead content, comply with the regulation. These two materials must not be used in vehicles or electrical and electronic equipment.

3. Conflict Minerals Rule – SEC

Dodd-Frank Act and „Conflict Minerals“

Disclosure obligations regarding conflict materials along the supply chain

The aim of this regulation is to crack down on the financing of armed groups in the DR Congo through the extraction and trade of raw materials. The background to this are ongoing conflicts, particularly in regions in the east of the DR Congo ("Great Lakes Region"), which have significant negative effects on the population living there and result in a precarious humanitarian situation.

In the machining production of precision components, tungsten steels are sometimes used (e.g. 1.2519). For such steels, we recommend our customers to always order an accompanying inspection certificate according to EN10204 - 3.1 or EN10204 - 3.2. The origin of the raw product can then be clarified in advance and thus serves as evidence.

4. Note

We can only determine the exact composition and origin of the materials if we have a factory certificate for the respective material. This factory certificate is usually ordered by us only at the request of our customer, otherwise we rely on the information on the delivery note from our suppliers. We do not perform any additional analysis. Even if we consider the information from our suppliers to be reliable, we do not assume any liability for the correctness and completeness of the data, recommendations and information.

On orders with our suppliers, we refer to the mandatory regulation in our purchasing conditions, according to which we only order RoHS and REACH compliant products; any deviations must be clearly noted on the supplier's order confirmation.

This declaration is made on behalf of ESTECH Industries AG, including the following companies:

- ESTECH Industries AG Fischer Frech-Hoch, Industriestrasse 6, 5616 Meisterschwanden (Switzerland)
- ESTECH Industries Angenstein AG, Industriestrasse 101, 4147 Aesch (Switzerland)
- RCM ESTECH AG, Lyssacherstrasse 107 / 109, 3400 Burgdorf (Switzerland)

Meisterschwanden, 01. January 2025

A handwritten signature in blue ink, appearing to read 'M. H. + +', representing Martin Helfenstein.

Martin Helfenstein,
Head of division, ESTECH Industries AG

A handwritten signature in blue ink, appearing to read 'P. Grau', representing Pascal Grau.

Pascal Grau
Commercial manager, ESTECH Industries AG