

Declaration of Conformity

EU Regulation 1907/2006/EC – “REACH”

Registration, Evaluation, Authorization and Restriction of Chemicals

Date 18 November 2025
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Title Use of Substances of very high Concern (SVHC)

PTR HARTMANN GmbH is very aware of its responsibilities towards the environment and mankind. This is why we have been certified since 1999 according to the environmental management standard DIN EN ISO 14001. New environmental targets are regularly defined, and conformity is verified in the annual TÜV audits. As a matter of course, PTR HARTMANN GmbH automatically and immediately checks new or modified environmental and health directives and regulations for compliance, issues appropriate declarations of conformity and if necessary, adapts its products accordingly to furthermore ensure conformity.

On **25 June 2025** the European Chemicals Agency ECHA has added further substances to the SVHC ("substances of very high concern") Candidate List, increasing it to **250** listed substances. As a downstream user PTR HARTMANN GmbH is not obliged to register or authorize these chemical substances. The company nonetheless sees it as its duty to release information according to Article 33. This article dictates a duty to inform about the existence of SVHC when their mass percentage in an article is higher than 0.1 percent by weight. Furthermore, the use of SVHC added to Annex XIV, which includes a list of substances subject to authorization, is – according to Article 56 – forbidden or restricted.

According to our current state of knowledge, the product(s) shown below and its/their components and packages fulfill(s) the demands for use of substances subject to authorization of Annex XIV. The detailed SVHC status is shown in the annex.

Annex III of EU RoHS Directive allows exemptions of the limits stated in Annex II. Amongst other exemptions 6(a) and 6(a)-I allow up to 0.2% respective 0.35% lead in steel alloys, exemption 6(c) allows lead in copper alloys with a share of up to 4% w/w. Components which contain such (an) alloy(s) and also their related products make use of this exemption(s), they are also RoHS-conform. Currently we are working to reduce the lead share to the allowed threshold of maximum 0.1% in homogeneous materials. We follow the specifications and the transitional periods of the EU RoHS Directive and will change our products accordingly.

This Declaration of Conformity is provided based on our suppliers' information.

If you have any further questions about REACH or other environmentally relevant or human rights topics, please contact our Material Compliance Management at mc@ptr-hartmann.com.

PTR HARTMANN GmbH

Material Compliance Management

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PTR HARTMANN

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Annex to Declaration of Conformity EU Regulation 1907/2006/EC of 18 November 2025

PTR HARTMANN Reference Number	PTR HARTMANN Article Description	SVHC >0.1% Name	SVHC CAS Number	Concern Element	SVHC Share in Concern Element
MWZ1 __ 01 __ 01 67 -----	IP67 Tension spring mechanism MWZ1 wired version	NONE	N/A	N/A	N/A
MWZ1 __ 01 _____ 67	IP67 Tension spring mechanism MWZ1 non wired version	NONE	N/A	N/A	N/A
MDB1 __ 01 ____	Leaf spring mechanism MDB1	NONE	N/A	N/A	N/A
MBB1 __ 01 ____	Leaf spring mechanism MBB1	NONE	N/A	N/A	N/A
	Leaf spring mechanism MBB1 with roller lever	LEAD	7439-92-1	Roller Lever	<4%
MAB1 _____ A	Leaf spring mechanism MAB1	NONE	N/A	N/A	N/A
	Leaf spring mechanism MAB1 with roller lever	LEAD	7439-92-1	Roller Lever	<4%
MAZ1 _____ A	Leaf spring mechanism MAZ1	NONE	N/A	N/A	N/A
	Leaf spring mechanism MAZ1 with roller lever	LEAD	7439-92-1	Roller Lever	<4%