

The following Compliance Statement pertains to all SPIROL global locations:

### RoHS/ELV, REACH, Prop 65, Conflict Minerals & MSDS Requirements

SPIROL recognizes its responsibility as a member of the global community to contribute to the maintenance of a healthy environment. Our goal is to become the industry leader and a model for others in the preservation of the environment.

#### RoHS/ELV

Directives 2011/65/EU and 2015/863 Restriction of Hazardous Substances (RoHS) of the European Parliament and of the Council of the European Union requires the restriction of the use of lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls (PBB), and polybrominated diphenyl ethers (PBDE) in electrical and electronic equipment.

Directive 2000/53/EC – End of Life Vehicles (ELV) of the European Parliament and of the Council of the European Union requires the restriction of the use of lead, mercury, cadmium and hexavalent chromium.

All aluminium, brass, carbon steel, and stainless steel products manufactured by SPIROL meet the requirements of Directives 2017/2102/EU, 2011/65/EU, 2015/863 and 2000/53/EC. SPIROL's manufactured products meet the exemption criteria for lead based on:

- Steel, stainless steel and steel alloy products contain less than 0.35 percent lead by weight.
- Aluminum products contain less than 0.4 percent lead by weight.
- Brass products contain less than 4 percent lead by weight.

Copper and brass alloys containing up to 4% lead (Pb) by weight remain compliant under the latest revision of the RoHS directive due to Exemption 6(c) however the expiry date for the current renewal cycle is July 2021. An application to renew Exemption 6(c) was successfully filed by a large industry working group in January 2020 before the submission deadline. The application was endorsed by 48 trade associations demonstrating strong support from industry. The extension for Exemption 6(c) was requested for the maximum permissible validity period.

The EU Commission is expected to decide on the application by January 21, 2021 which is six months before the expiry date. In the event that a backlog of activity delays the ruling, which occurred during the last review cycle, the exemption will remain valid during the extended deliberation period per Article 5.

When used in applications where environmental and safety beneficial substitutions are technically or scientifically impractical, SPIROL can provide customer specific finishes which do not conform to either of these two European directives.

#### REACH

In regard to Directive 1907/2006 EC Registration, Evaluation, Authorization and Restriction of Chemical substances of the European Parliament and of the Council of the European Union, SPIROL is not required to register, however; the suppliers of raw materials for SPIROL products are registered.

SPIROL's pins, tubular and metal products manufactured from aluminum, carbon steel, and stainless steel meet the requirements of Directive 1907/2006 EC Registration, Evaluation, Authorization and Restriction of Chemical substances (REACH).

The European Chemical Agency has added Lead to the Substances of Very High Concern (SVHC) list. SPIROL's Precision Cut Fasteners manufactured from brass contain Lead exceeding 0.1% by weight. Due to the presence of lead, additional requirements for use and import may be required. SPIROL will provide Safety Data Sheets upon request.

*Please refer to Appendix B for SPIROL REACH Quality contact information.*

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## PERSISTENT ORGANIC POLLUTANTS (POPs)

In regard to Regulation 2019/1021 of the European Parliament and of the Council of the European Union on Persistent Organic Pollutants (POPs) and its amendments: SPIROL manufactured products do not contain any listed POPs as defined therein.

## CALIFORNIA PROPOSITION 65 DECLARATION



### WARNING

Certain products manufactured by SPIROL International Corporation can present risk of exposure to lead or other chemicals, which are known to the State of California to cause cancer and birth defects or other reproductive harm. For more information go to [www.P65Warnings.ca.gov](http://www.P65Warnings.ca.gov).

These products, when used and disposed of under intended and foreseeable circumstances, do not pose a significant risk of exposure.

Safety Data Sheets are available upon request. For more information, contact our Environmental, Health and Safety department or your Customer Service representative at 860-774-8571.

## CONFLICT MATERIALS

SPIROL shares concerns of our Global Community to prevent profiting from metals mining (“conflict materials”) countries that may be fueling human rights atrocities in the Democratic Republic of the Congo (DRC) or adjoining countries.

SPIROL does not use “Conflict Minerals”<sup>1</sup> in the manufacture of our products. SPIROL’s products manufactured from aluminum, brass, carbon steel, and stainless steels are not sourced from “DRC Countries”<sup>2</sup>.

In July 2010, the United States enacted the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Act”) which contained a section that regulated “Conflict Minerals”<sup>1</sup>. The Act includes provisions that require manufacturers to perform due diligence in their supply chains to identify and disclose the use of any Conflict Minerals and whether those Conflict Minerals originated in the “DRC Countries”<sup>2</sup>.

SPIROL is compliant with the Act and other requirements concerning the sourcing of our raw materials from conflict areas. SPIROL also expects suppliers to comply with our Code of Conduct.

<sup>1</sup> “Conflict Minerals” include columbite-tantalite (coltan), cassiterite, gold, wolframite, tantalum, tin, tungsten, and any derivatives from these minerals.

<sup>2</sup> “DRC Countries” include the Democratic Republic of the Congo, Angola, Burundi, the Central African Republic, The Republic of Congo, Uganda, Rwanda, Sudan (South Sudan), Tanzania, and Zambia.

## SDS REQUIREMENTS

According to the Occupational Safety and Health Administration Hazard Communication Standard, SPIROL products meet the definition of “article” and do not require a material safety data sheet.

1910.1200(b)(6)(iv)

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“Article” means a manufactured item: (i) which is formed to a specific shape or design during manufacture; (ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and (iii) which does not release, or otherwise result in exposure to, a hazardous chemical under normal conditions of use.

For more information on RoHS, REACH, Conflict Minerals or SDS Requirements, contact the Quality Assurance Department at your local SPIROL facility. (Reference Appendix B)

#### **US EPA TOXIC SUBSTANCE CONTROL ACT (TSCA)**

SPIROL products qualify as “articles” as defined by TSCA and are therefore not subject to TSCA requirements. Additionally, SPIROL products do not contain any chemicals identified in TSCA Section 6(h) published on January 6, 2021.

Sincerely,

**Ian Martin**

Ian Martin  
Chairman - SPIROL Global Quality Council

Sincerely,

A handwritten signature in black ink that reads "Daniel K. Gilbreath". The signature is fluid and cursive.

Daniel K. Gilbreath  
Environmental, Health, Safety, and Audit Manager



## APPENDIX A

### GLOBAL LOCATIONS

#### NORTH AMERICA

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#### SOUTH AMERICA

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#### EUROPE

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#### ASIA / PACIFIC

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## APPENDIX B

### SPIROL QUALITY CONTACT INFORMATION

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**Mexico:** Jair Gomez - Quality Assurance Manager | +52 (01) 81 8385 4390 | [info-mx@spirol.com](mailto:info-mx@spirol.com)  
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