

Your request concerning RoHS II and III-Directive 2001/65/EU and 2015/863/EU

We thank you for your request for information on the RoHS-Directive.

RoHS stands for Restriction of Hazardous Substances, and impacts the entire electronics industry and many electrical products as well. The original RoHS, also known as Directive 2002/95/EC, originated in the European Union in 2002 and restricts the use of six hazardous materials found in electrical and electronic products. All applicable products in the EU market since July 1, 2006 must pass RoHS compliance.

Directive 2011/65/EU was published in 2011 by the EU, which is known as RoHS-Recast or RoHS 2. RoHS 2 includes a CE-marking directive, with RoHS compliance now being required for CE marking of products. RoHS 2 also added Categories 8 and 9, and has additional compliance recordkeeping requirements.

Directive 2015/863 was published in 2015 by the EU, which is known as RoHS 3. RoHS 3 adds four additional restricted substances (phthalates) to the list of six.

Any business that sells applicable electrical or electronic products, equipment, sub-assemblies, cables, components, or spare parts directly to RoHS-directed countries, or sells to resellers, distributors or integrators that in turn sell products to these countries, is impacted if they utilize any of the restricted 10 substances.

EU RoHS specifies maximum levels for the following 10 restricted substances. The first six applied to the original RoHS while the last four were added under RoHS 3, which takes effect July 22, 2019.

- Cadmium (Cd): < 100 ppm
- Lead (Pb): < 1000 ppm
- Mercury (Hg): < 1000 ppm
- Hexavalent Chromium: (Cr VI) < 1000 ppm
- Polybrominated Biphenyls (PBB): < 1000 ppm
- Polybrominated Diphenyl Ethers (PBDE): < 1000 ppm
- Bis(2-Ethylhexyl) phthalate (DEHP): < 1000 ppm
- Benzyl butyl phthalate (BBP): < 1000 ppm
- Dibutyl phthalate (DBP): < 1000 ppm
- Diisobutyl phthalate (DIBP): < 1000 ppm

The Directive intends a gradual extension to all electrical and electronic equipment by 22 July 2019. In this context additional products will be added to the present scope such as e.g. medical equipment, monitoring and control devices by 22 July 2014 and by 22 July 2017 also industrial monitoring and control devices.

Extension exemption ROHS 3: Of note is that medical devices have a two-year extension to meet RoHS 3 compliance:

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"The restriction of DEHP, BBP, DBP and DIBP shall apply to medical devices, including in vitro medical devices, and monitoring and control instruments, including industrial monitoring and control instruments, from 22 July 2021."

Fasteners are not in the scope of the Directive. However if they are a part of the products within the scope of ROHS 3, fasteners can be involved as well. Hereby, we are sending our Declaration on compliance.

Please contact us if further information is required. Yours sincerely,

Stafa Group

Joep van Gool Operations & Finance Director

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DECLARATION OF COMPLIANCE

EU-Directive 2011/65/EU (also known as RoHS 2 or RoHS II) and the additional RoHS 3 (EU Directive 2015/863) on the restriction of the use of certain hazardous substances in electrical and electronic equipment. And 2002/96/EC The EU Directive on waste electrical and electronic equipment (WEEE). With this document we:

| Company: | Stafa Group B.V. |
|--------------|------------------------------------|
| Address: | Den Engelsman 18 |
| Code / Town: | 6026 RB Maarheeze, the Netherlands |

Declare, that fasteners with hereunder mentioned characteristics and supplied by our company, based upon the test method DIN EN 15205 resp. DIN EN ISO 3613 meet the requirements of the RoHS EU Directive 2015/863 and 2002/96/EC. This means they do not contain the following substances in concentrations greater than listed:

| Substance: | Limit (in weight): |
|--|--------------------|
| Lead(Pb) | 0,10% |
| Mercury (Hg) | 0,10% |
| Cadmium (Cd) | 0,01% |
| Hexavalent Chromium (Cr6+) | 0,10% |
| Poly Brominated Biphenyls (PBB) | 0,10% |
| Poly Brominated Diphenyl ethers (PBDE) | 0,10% |
| Bis (2-ethylhexyl) Phthalate (DEPHP) | 0,10% |
| Butyl Benzyl Phthalate (BBP) | 0,10% |
| Dibutyl Phthalate (DBP) | 0,10% |
| DIIsobutyl Phthalate (DIBP) | 0,10% |

Base material:

- Steel
- Stainless steel
- Non-ferrous metal
- Synthetics

Based upon test methods:

DIN EN 15205 ISO 3613:2010

References:

ISO 4042 ISO 8839 ISO 10683 ISO 10684 ISO 12683 DIN 50979

Coating:

- Without
- Zinc plated, blue or blank passivated
- Zinc lamellae coating without Cr (VI), among Geomet[®]
- Hot dip galvanized

Determination of hexavalent chromium in corrosion protection layers Metallic and other inorganic coatings

Acc. International Organization for Standardization

Fastening elements - Electroplated coatings Mechanical properties of fasteners Non-electrolytically applied zinc flake coatings Fasteners -- Hot dip galvanized coatings Mechanically plating processed zinc coatings Metallic coating galvanic Zinc and Zinc plated coatings

Stafa Group

Joep van Gool / Operations & Finance Director

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