

The following Compliance Statement pertains to all SPIROL global locations:

RoHS/ELV, REACH, Prop 65, Conflict Minerals, SDS & PFAS 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 aluminum, 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) with an expiry date of July 2027.

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 Regulation (EC) 1907/2006 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 the latest version of Regulation (EC) 1907/2006 (Including all directives and annexes listed within) Registration, Evaluation, Authorization and Restriction of Chemical substances (REACH) dated on or before the revision date of this document.

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.

SCIP is the database for information on Substances of Concern in articles as established under the Waste Framework Directive (WFD). Companies supplying articles containing substances of very high concern (SVHCs) on the Candidate List in a concentration above 0.1% weight by weight (w/w) on the EU market have to submit information on these articles to ECHA. The SCIP codes for SPIROL brass products containing up to 4% lead (Pb) by weight are as follows:



SCIP Number	Names
a50faee1-190f-4b23-9aa1-d65add4829a0	SPIROL Brass Nuts
2b5fc4b2-3709-48ee-adb3-e523725f514b	SPIROL Brass Inserts
24e4174e-186e-4c1e-812d-9ca3d0092dfb	SPIROL Brass Compression Limiters

Please refer to Appendix A for SPIROL REACH Quality contact information.

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.

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”¹ in the manufacture of our products. SPIROL’s products manufactured from aluminum, brass, carbon steel, and stainless steels are not sourced from “DRC Countries”².

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”¹. 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”².

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.

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

² “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)

“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 A)

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.

PERFLUOROALKYL AND POLYFLUOROALKYL SUBSTANCES (PFAS)

The United States Toxic Substances Control Act (TSCA) is a federal regulation that allows the Environmental Protection Agency (EPA) to comprehensively manage chemicals in U.S. Commerce. This includes reporting requirements under TSCA Section 8(a)(7), which apply to perfluoroalkyl and polyfluoroalkyl substances (PFAS). TSCA mandates the reporting of certain information from U.S. manufacturers of all PFAS chemicals, including PFAS created as manufacturing byproducts. Reporting is also required for PFAS imported into the United States, whether on their own or as an incorporated article component.

As defined by the Organization for Economic Co-operation and Development (OECD): “fluorinated substances that contain at least one fully fluorinated methyl or methylene carbon atom (without any H/Cl/Br/I atom attached to it), i.e., with a few noted exceptions, any chemical with at least a perfluorinated methyl group (–CF₃) or a perfluorinated methylene group (–CF₂–) is a PFAS.”

Products sold or otherwise placed on the market by SPIROL International Corporation do not contain any of the PFAS reportable substances.

Sincerely,

David LaFleur
President



APPENDIX A

GLOBAL LOCATIONS & CONTACT INFORMATION

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