



Bonnell Aluminum Product Compliance Declaration

Effective: March 01, 2022

This declaration is provided in response to an inquiry on whether Bonnell Aluminum's products supplied to your Company are compliant with global regulation requirements that we understand may be applicable to our customers. This declaration covers Bonnell Aluminum's various aluminum extrusions and excludes Futura Transitions and Bonnell Aluminum's TSLOTS products.

Bonnell Aluminum does not directly place its aluminum products on the European Union (EU) market and is therefore not subject to EU legislation. REACHⁱ, CLPⁱⁱ, RoHSⁱⁱⁱ and/or BPR^{iv} only apply to products imported into the EU and place obligations on EU importers and/or non-EU manufacturers who export such products to the EU. Bonnell Aluminum's products are considered "articles" within the scope of REACH and CLP. RoHS applies to electric and electronic equipment (EEE). BPR applies to biocidal products and/or treated articles.

If the Company is supplying products purchased from Bonnell Aluminum to the EU (or products containing Bonnell Aluminum's products as parts), it should independently assess any obligations it might have under REACH, CLP, RoHS, and/or BPR.

Aluminum alloys typically contain lead, cadmium, and mercury assumed well below the threshold levels for **REACH** and **RoHS**. While these elements are considered impurities and are not intentionally added to the alloys produced by Bonnell Aluminum, there may be trace amounts resulting from aluminum scrap recycling that are expected to be below threshold limits for REACH and RoHS.

Bonnell Aluminum confirms that at the date of this declaration Bonnell Aluminum's products supplied to your Company may contain substances of very high concern (SVHC) as identified under REACH and CLP and/or substances restricted by the RoHS Directive. Bonnell Aluminum products may contain the following SVHC, assumed below their thresholds (<0.1% w/w): lead, cadmium, chromium, and mercury.

In addition, Bonnell Aluminum products can include paints and coatings as specified by the Company to be used as finishes that may contain any of the following SVHC, assumed below their thresholds (<0.1% w/w): strontium chromate, chromium trioxide, lead chromate, carbon black, or pigment yellow 34 (CrO₈Pb₂S).

Bonnell Aluminum products do not contain substances restricted by **BPR**.

Bonnell Aluminum is also committed to compliance with specific State obligations within the United States. **California Proposition 65^v** does not have threshold limits and aluminum alloys typically contain lead, cadmium, and mercury at de minimus concentrations. While none of these elements listed on California Proposition 65 are intentionally added to the alloys produced by Bonnell Aluminum, there may be trace amounts resulting from aluminum scrap recycling that are expected to be at de minimus concentrations. Customer products containing Bonnell Aluminum's aluminum in their products should include a California Proposition 65 label. Paints and coatings as specified by the Company that are applied to Bonnell Aluminum products may include any of these additional chemicals listed under California Proposition 65: cumene, carbon black, pigment black 6, cobalt titanite green spinel, nickel oxide, titanium dioxide, or talc.

Safe harbor levels, which include No Significant Risk Levels (NSRLs) for cancer-causing chemicals and Maximum Allowable Dose Levels (MADLs) for chemicals causing reproductive toxicity, have been established for many of the chemicals listed under Proposition 65. Safe harbor levels for elements that may be present in Bonnell Aluminum products are listed below:

- Cadmium – NSRL 0.05 ug/day (inhalation); MADL 4.1 ug/day (oral)
- Lead – NSRL 15 ug/day (oral); MADL 0.5 ug/day
- Carbon Black listing only pertains to airborne, unbound carbon black particles of respirable size. Thus, for the purposes of Proposition 65, carbon black particles 10 µm or less shall be considered respirable. Exposure to carbon black, per se, does not occur when it remains bound within a product matrix, such as paint.
- Chromium (hexavalent compounds) - NSRL 0.001 ug/day (inhalation); MADL 8.2 ug/day (oral). Hexavalent chromium compounds are those that contain the metallic element chromium (Cr) in its hexavalent (positive-6) valence state. Exposures to Cr(VI) occur, for example, in applying paints and coating containing Cr(VI) compounds.
- Mercury and mercury compounds do not have safe harbor levels (NSRL or MADL).

Exposure to any of these elements that may be present could occur during fabrication (cutting, drilling, grinding) of Bonnell Aluminum's product.

Additionally, Bonnell Aluminum's products do not include any **asbestos** containing materials. Raw materials used in the production of Bonnell Aluminum's aluminum products do not contain any asbestos nor have these materials or products come into contact with any asbestos during the manufacture / packing or shipping.

Bonnell Aluminum's products do not include any Perfluorooctanesulfonic acid (**PFOS**), Per- and polyfluoroalkyl substances (**PFAS**), or perfluorooctanoic acid (**PFOA**) containing materials.

Bonnell Aluminum will provide this declaration annually in accordance with the current regulations at the effective date of publication. Any additional requests for declarations beyond the scheduled annual update and publication or request to provide evidence of any of these compliance declarations will be completed at a cost charged to the Customer.

Carl W. Czarnik
Carl Czarnik, Vice President of Operations
Bonnell Aluminum, Inc.

ⁱ EU REACH 1907/2006: The Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation requires the identification of Substances of Very High Concern (SVHC) contained in substances and mixtures above the threshold 0.1% weight by weight manufactured and marketed in the EU. This declaration is inclusive of the **SVHC Candidate List, effective January 17, 2022**.

ⁱⁱ Regulation (EC) No 1272/2008 on the Classification, Labeling and Packaging of substances and mixtures (CLP): CLP introduces the United Nations globally harmonized system (UN GHS) for classification and labeling of chemicals into Europe. CLP entered into force on 20th January 2009. The CLP Regulation, Article 46, on Enforcement and Reporting, states that all necessary measures, including maintaining a system of official controls, to ensure that substances and mixtures are not placed on the market, unless they have been classified, labelled, notified, and packaged in accordance with this Regulation.

ⁱⁱⁱ RoHS 2 Directive 2017/2102/EU (Amending Directive 2011/65/EU): The Restriction of Hazardous Substances (RoHS) Directive restricts the use of specific substances above an identified threshold, without applicable exemption, for products placed on the market in EU member states. Commission delegated Directive 2015/863 amending Annex II to Directive 2011/65/EU of the European Parliament and of the Council as regards the list of restricted substances referred to in Article 4(1), effective July 22, 2019.

^{iv} Biocidal Properties Regulations (BPR) EC (528/2012) and EU (1062/2014): BPR requires the identification of Active Substances (as such term is defined in the Regulations) used in Biocidal products to be (i) registered and (ii) approved for use (from a list of approved active substances and suppliers). Biocidal products are substances or mixtures that contain Active Substances applied to articles with the intention of destroying, deterring, rendering harmless, preventing the action of, or otherwise exerting a controlling effect on, any harmful organism by chemical or biological means.

^v California Proposition 65 (Cal. Code Regs. Tit. 27 § 27001): requires the labeling of products containing any of the chemicals known to cause cancer, birth defects or other reproductive harm (Legal Reference Safe Drinking Water and Toxic Enforcement Act of 1986). Exposure levels and discharges to drinking water sources that are below the safe harbor levels are exempt from the requirements of Proposition 65. The current California Proposition 65 list is dated **February 25, 2022**.