



Bonnell Aluminum Product Compliance Declaration

Effective: March 25, 2026

This document contains information on whether products manufactured by Bonnell Aluminum and its subsidiaries (collectively, "Bonnell Aluminum") are compliant with certain global regulation requirements. This document covers all aluminum extruded products manufactured by Bonnell Aluminum except for products with thermal barriers, vinyl, Tredsafe inserts (see Futura Transitions by Bonnell Aluminum), accessories including but not limited to LED light kits, hardware, fasteners, and panel accessories (see TSLOTS by Bonnell Aluminum).

Bonnell Aluminum provides this Product Compliance Declaration to cover the following regulations:

- EU REACH 1907/2006 (SVHC List)
- EU RoHS Directive 2011/65/EU and (EU) 2015/863
- California Proposition 65
- PFAS Identification
- Biocidal Products Regulations EU (528/2012)
- Polychlorinated Biphenyls (PCBs)
- Asbestos Restrictions

Article 33(1) DECLARATION OF REACH COMPLIANCE

REACH Article 33(1) - Communication on Substances of Very High Concern in Products

REACH Candidate List version Date*	02/04/2026
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**REACH Candidate list of SVHC declarations including all substance names that were included up to the Candidate List Version Date above.*

In accordance with Article 33(1) of the REACH regulation (Regulation (EC) No. 1907/2006), this declaration applies to all Products sold or otherwise placed on the market by Bonnell Aluminum prior to the signature date shown below. Bonnell Aluminum meets all applicable REACH requirements and is committed to providing our customers with information about substances in its products as required.

Under REACH regulation, Bonnell Aluminum has a duty to communicate to its customers the presence of Substances of Very High Concern (SVHC) contained in its products in excess of 0.1% w/w (weight by weight). Bonnell Aluminum has reviewed the content of its products to determine the presence, if any, of the SVHC substances. No SVHCs were found to be present in Bonnell Aluminum's articles in excess of 0.1% w/w. This determination is based on engineering evaluation and supplier declarations and is correct to the best of Bonnell Aluminum's knowledge.

Bonnell Aluminum certifies that none of the Products referenced above contain SVHC(s), as per the list version dated above, at a concentration over the threshold of 0.1% w/w (weight by weight) at the article level.

DECLARATION OF RoHS COMPLIANCE
EU RoHS Directive 2015/863/EU (RoHS 3)

Substance/Substance Group	Threshold
Cadmium/Cadmium Compounds (Cd)	0.01% at homogeneous material level
Lead/Lead Compounds (Pb)	0.1% at homogeneous material level
Hexavalent chromium and Compounds (Cr6+)	0.1% at homogeneous material level
Mercury/Mercury Compounds (Hg)	0.1% at homogeneous material level
Polybrominated biphenyls (PBB)	0.1% at homogeneous material level
Polybrominated diphenyl ethers (PBDE)	0.1% at homogeneous material level
Bis(2-ethylhexyl) phthalate (DEHP)	0.1% at homogeneous material level
Butyl benzyl phthalate (BBP)	0.1% at homogeneous material level
Dibutyl phthalate (DBP)	0.1% at homogeneous material level
Di-isobutyl phthalate (DIBP)	0.1% at homogeneous material level

Applicability to Aluminum

Component Usage: If the extrusion is part of a product that requires electricity (e.g., heat sinks, housing, brackets, frames for consumer electronics), it must meet RoHS 3 standards.

Raw Material: Standard aluminum alloys (e.g., 6061, 6063) typically comply, as lead, mercury, and cadmium are not intentionally added.

Surface Treatment: Coatings, paints, and anodizing must be verified to ensure they do not introduce restricted substances, specifically Hexavalent Chromium (CrVI), which is sometimes used in conversion coatings.

RoHS 3 Thresholds for Aluminum

RoHS 3 restricts substances to <0.1% (1000 ppm) by weight at the homogeneous material level, with tighter limits for Cadmium (<0.01% or 100 ppm).

Key Exemptions (Lead)

While the directive aims for zero toxic substances, certain exemptions are relevant to aluminum extrusions:

Lead in Aluminum: Lead is allowed as an alloying element in aluminum up to 0.4% by weight (Exemption 6b).

Machining Exemption: Lead is allowed as an alloying agent in aluminum for machining purposes, though this is under review and subject to change.

Bonnell Aluminum certifies the casted aluminum logs and/or billet and the extrusion aluminum products referenced above meet the requirements specified in Directive 2002/95/EC, Directive 2011/65/EU, and Annex II – Directive 2015/863/EU. All Products sold or otherwise placed on the market by Bonnell Aluminum meets EU RoHS (Restriction of Hazardous Substances) Directive (2015/863/EU) (RoHS 3).

Bonnell Aluminum certifies that none of the casted or extruded aluminum products contain any of the listed EU RoHS (Restriction of Hazardous Substances) Directive (2015/863/EU) (RoHS 3) substances at a concentration over the given threshold limit by weight at the homogeneous material level (regardless of exemption status).



DECLARATION OF CALIFORNIA’S PROPOSITION 65 COMPLIANCE

Prop65 Compliance Statement

Bonnell Aluminum is committed to the safety and health of our employees and customers. California’s Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65) prohibits manufacturers from knowingly and intentionally exposing California consumers to a chemical known to cause cancer, birth defects or other reproductive harm without a “clear and reasonable” warning to enable California consumers to make informed decisions about their exposures to these chemicals.

Aluminum is not on the Proposition 65 list of chemicals known to the State of California to cause cancer or birth defects or other reproductive harm. Aluminum alloys typically contain lead, usually less than 0.1% w/w. Lead is on California’s cancer and reproductive harm lists for Prop 65. Bonnell Aluminum products are aluminum alloys and physiologically inert in their solid form and the lead is safely contained within, however user-generated dust and/or fumes may pose a hazard if inhaled or ingested. Heating beyond a certain temperature may also provide avenues for exposure. Exposure to any of these elements that may be present could occur during fabrication (cutting, drilling, grinding) of Bonnell Aluminum’s product. **Customer products containing products supplied by Bonnell Aluminum must be evaluated by the Customer to determine whether a California Proposition 65 label is required.**

The California Proposition 65 labels for Bonnell Aluminum products are provided below:

- Aluminum Extrusions, Billets or Logs (6XXX Series Alloys including: 6005, 6005A, 6060, 6061, 6063, 6082, 6105, 6181, 6351, 6360, 6463; Aluminum; Wrought Aluminum Products):

⚠️ WARNING: This product can expose you to chemicals including Lead, which is known to the State of California to cause cancer and birth defects or other reproductive harm. This product can expose you to chemicals including Nickel, which is known to the State of California to cause cancer. For more information go to www.P65Warnings.ca.gov.
- Pretreated and/or Painted Aluminum Extrusions (AAMA 2604, 2605) (6XXX Series Alloys including: 6005, 6005A, 6060, 6061, 6063, 6082, 6105, 6181, 6351, 6360, 6463; Aluminum; Wrought Aluminum Products):

⚠️ WARNING: This product can expose you to chemicals including Lead, Chromium (hexavalent compounds) and perfluorooctanoic acid, which are known to the State of California to cause cancer and birth defects or other reproductive harm. This product can expose you to chemicals including Nickel compounds, Nickel compounds, Nickel and Carbon black, which are known to the State of California to cause cancer, and Mercury and mercury compounds, which are known to the State of California to cause birth defects or other reproductive harm. For more information go to www.P65Warnings.ca.gov.
- Pretreated and/or Painted Aluminum Extrusions (AAMA 2603) (6XXX Series Alloys including: 6005, 6005A, 6060, 6061, 6063, 6082, 6105, 6181, 6351, 6360, 6463; Aluminum; Wrought Aluminum Products):

⚠️ WARNING: This product can expose you to chemicals including Lead and Chromium (hexavalent compounds), which are known to the State of California to cause cancer and birth defects or other reproductive harm. This product can expose you to chemicals including Nickel, Carbon black, Nickel compounds and Nickel compounds, which are known to the State of California to cause cancer. For more information go to www.P65Warnings.ca.gov.

Proposition 65 material list date**	12/08/2025
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**Proposition 65 material list including all substance names that were included up to the Material List Version Date above.

DECLARATION: PFAS

Per- and polyfluoroalkyl substances (PFAS) are widely used, long lasting chemicals that may be linked to harmful health effects. Due to growing awareness of health and environmental concerns, PFAS are facing increasing scrutiny worldwide.

This communication applies to all products sold or otherwise placed on the market by Bonnell Aluminum prior to the signature date of this declaration.

Bonnell Aluminum products **do not contain PFAS** chemicals, **excluding any painted or coated products** where PFAS chemicals may exist within the Customer’s specified coating or paint.

Bonnell Aluminum products that are painted may contain the following PFAS chemicals:

Product(s)	Substance Name or CAS Number	Concentration (%)	Where in the product is the substance found?
Painted Aluminum Extrusions (Based on Paint Supplier Data)	9002-84-0	<0.1%	Painted Surface (High-Performance Paint)
	24937-79-9	<0.1%	

DECLARATION: BIOCIDAL PRODUCTS REGULATIONS EU (528/2012)

This declaration is related to Biocidal Products Regulations EU (528/2012) and applies to all products sold or otherwise placed on the market by Bonnell Aluminum prior to the signature date of this declaration.

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

DECLARATION: POLYCHLORINATED BIPHENYLS (PCBs)

This declaration is related to polychlorinated biphenyls (PCBs) and applies to all products sold or otherwise placed on the market by Bonnell Aluminum prior to the signature date of this declaration.

Bonnell Aluminum products **do not contain Polychlorinated Biphenyls (PCBs)**.

DECLARATION: ASBESTOS

This declaration is related to asbestos and applies to all products sold or otherwise placed on the market by Bonnell Aluminum prior to the signature date of this declaration.

Bonnell Aluminum’s products **do not contain** any **asbestos**. Raw materials used in the production of Bonnell Aluminum’s products do not contain any asbestos nor have the products come into contact with any asbestos during manufacturing, packing or shipping.

Limitations

The information provided herein is accurate to the best of Bonnell Aluminum's knowledge. This document covers all aluminum extruded products manufactured by Bonnell Aluminum except for products with thermal barriers, vinyl, Tredsafes inserts (see Futura Transitions by Bonnell Aluminum), accessories including but not limited to LED light kits, hardware, fasteners, and panel accessories (see TSLOTS by Bonnell Aluminum).

The provided information is based upon data obtained from ongoing due diligence concerning goods and materials provided by third party suppliers. Bonnell Aluminum provides such information "AS IS," without any express or implied warranty of any kind. Bonnell Aluminum reserves the right to update and modify this communication, as it deems necessary or appropriate.

Bonnell Aluminum does not directly place its products on the European Union (EU) market and is therefore not subject to EU legislation. REACH, CLP, RoHS, and/or BPR 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.

Aluminum billets used in the manufacturing of aluminum extrusions are produced from elements extracted from the Earth's crust and recycled aluminum and may contain minute traces of impurities such as lead, cadmium, and mercury. None of these impurities are intentionally added as they are considered contaminants to our process.

Paints and coatings applied by Bonnell Aluminum to the product as specified by the Customer may include additional restricted substances or chemicals as listed under California Proposition 65, REACH SVHC or RoHS, or EPA TSCA. Following the application process for the Customer's specified paints and coatings, it is assumed any regulated substances present in the Customer's specified paints and coatings will be below their respective thresholds (<0.1% w/w) based on paint concentrations and applied coating thickness.

The Customer should independently assess any requirements it might have under REACH, CLP, RoHS, and/or BPR when supplying products supplied by Bonnell Aluminum to the EU, including products containing Bonnell Aluminum's products as parts or components.

The Customer agrees to pay all costs and expenses relative to requests for updated documentation beyond the scheduled annual update and publication or requests to provide evidence of compliance.



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