



Bonnell Aluminum Product Compliance Declaration

Effective: January 24, 2025

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
- Persistent Organic Pollutants (POPs) Regulation (EU) 2019/1021

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* | 01/21/2025 |
|------------------------------------|------------|

**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 the 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.

Checking this box 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 2011/65/EU and Amendment 2015/863/EU

| 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 |

This declaration is related to Article 4(1) of the EU RoHS (Restriction of Hazardous Substances) Directive (2011/65/EU) and applies to all Products sold or otherwise placed on the market by Bonnell Aluminum prior to the signature date shown below.

Products produced by Bonnell Aluminum do not contain any declarable or prohibited substances above the threshold or reporting limits as defined by the EU Directive.

Bonnell Aluminum certifies that none of Bonnell Aluminum's products contain any of the listed substances in the above table at a concentration over the given threshold limit by weight at the homogeneous material level (regardless of exemption status).



DECLARATION OF Prop 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. The list of carcinogen or reproductive toxins now includes over 900 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.**

WARNING: Aluminum products may contain elements or chemicals known to the State of California to cause cancer, birth defects or reproductive harm. These elements include but are not limited to Chromium, Cobalt, Lead, and Nickel.

For more information visit www.P65Warnings.ca.gov.

| | |
|-------------------------------------|------------|
| Proposition 65 material list date** | 01/03/2025 |
|-------------------------------------|------------|

***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.

DECLARATION OF EU POPs COMPLIANCE
Persistent Organic Pollutants (POPs) Regulation (EU) 2019/1021
Table 1: Restricted Substances

| Substance/Substance Group | CAS | % Threshold |
|---|------------|-------------|
| 1,6,7,8,9,14,15,16,17,17,18,18-Dodecachloropentacyclo[12.2.1.16,9.02,13.05,10]octadeca-7,15-diene (Dechlorane Plus) [covering any of its individual anti- and syn-isomers or any combination thereof] | | 0.000 |
| 2-(2H-Benzotriazol-2-yl)-4,6-bis(1,1-dimethylpropyl)phenol | 25973-55-1 | 0.000 |
| Aldrin | 309-00-2 | 0.000 |
| Alkanes, C10-13, chloro (Short Chain Chlorinated Paraffins) | | 0.150 |
| Benzo[a]pyrene | 50-32-8 | 0.000 |
| Benzo[b]fluoranthene | 205-99-2 | 0.000 |
| Benzo[k]fluoranthene | 207-08-9 | 0.000 |
| Chlordane | 57-74-9 | 0.000 |
| Chlordecone (Kepone) | 143-50-0 | 0.000 |
| DDT (Dichlorodiphenyl-trichloroethane) | 50-29-3 | 0.000 |
| Decabromodiphenyl ether [decaBDE] | 1163-19-5 | 0.001 |
| Dicofol | 115-32-2 | 0.000 |
| Dieldrin | 60-57-1 | 0.000 |
| Endosulfan | 115-29-7 | 0.000 |
| Endosulfan I | 959-98-8 | 0.000 |
| Endosulfan II | 33213-65-9 | 0.000 |
| Endrin | 72-20-8 | 0.000 |
| Heptabromodiphenyl ether | | 0.001 |
| Heptachlor | 76-44-8 | 0.000 |
| Hexabromobiphenyl | 36355-01-8 | 0.000 |
| Hexabromocyclododecane (HBCDD) and all major diastereoisomers | | 0.0075 |
| Hexabromodiphenyl ethers | | 0.001 |
| Hexachlorobenzene | 118-74-1 | 0.001 |
| Hexachlorobutadiene | 87-68-3 | 0.000 |
| Hexachlorocyclohexane | | 0.000 |

| Substance/Substance Group | CAS | % Threshold |
|--|-----------|-------------|
| Indeno[1,2,3-cd]pyrene | 193-39-5 | 0.000 |
| Methoxychlor | 72-435 | 0.000 |
| Mirex | 2385-85-5 | 0.000 |
| Pentabromodiphenyl ether | | 0.001 |
| Pentachlorobenzene | 608-93-5 | 0.000 |
| Pentachlorophenol and its salts and esters | | 0.0005 |
| Perfluorohexane-1-sulphonic acid and its salts [PFHxS] | | 0.0000025 |
| Perfluorooctane Sulfonic Acid (PFOS) and Its Salts and Transformation and Degradation Precursors | | 0.001 |
| Perfluorooctanoic acid (PFOA) and individual salts and esters of PFOA | | 0.0000025 |
| Polychlorinated biphenyls | | 0.000 |
| Polychlorinated dibenzofurans | | 0.0000005 |
| Polychlorinated dibenzo-p-dioxins | | 0.0000005 |
| Polychlorinated naphthalenes (PCN) | | 0.000 |
| Tetrabromodiphenyl ether | | 0.001 |
| Toxaphene (Polychlorinated camphenes) | 8001-35-2 | 0.000 |

EU POPs Compliant Product(s)

This declaration is related to Annex I - IV of EU POPs, Bonnell Aluminum's products are deemed **not to contain** the restricted substances listed in Table 1 above the noted threshold. Bonnell Aluminum certifies that **all products** provided by Bonnell Aluminum **do not contain** any of the substances referenced above at a concentration over the given threshold.

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, 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).

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.

Bonnell Aluminum, Inc. certifies that the information it provides above is accurate. The provided information is based upon data obtained from ongoing due diligence concerning goods and materials. Bonnell Aluminum, Inc. will update and modify this communication, as it believes necessary or appropriate.

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

Carl W. Czarnik