



## Bonnell Aluminum Product Compliance Declaration

Effective: August 15, 2020

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.

Bonnell Aluminum does not directly place its aluminum products on the European Union (EU) market and is therefore not subject to EU legislation. REACH<sup>i</sup>, CLP<sup>ii</sup>, RoHS<sup>iii</sup> and/or BPR<sup>iv</sup> 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. Bonnell Aluminum products may contain trace amounts of lead as an impurity introduced by recycled content, assumed below 0.1% w/w. Lead metal was added to the SVHC Candidate List in June 2018.

The European Commission accordingly amended the former regulations of Directive 2011/65/EU and adopted Directive 2018/740/EU thus extending RoHS exemption 6(b) applying to lead as an alloying element in aluminum products used for electronic equipment containing up to 0.4% lead by weight. Aluminum alloys typically contain lead, cadmium, and mercury assumed well below the threshold levels for RoHS. While none of these elements 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 below threshold limits for 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** and **BPR**. Bonnell Aluminum products may contain the following SVHC, assumed below their thresholds: lead, cadmium, chromium, and mercury. Paint and coatings used as finishes on Bonnell Aluminum products may contain any of the following SVHC, assumed below their respective threshold limits: strontium chromate, chromium trioxide, lead chromate, or pigment yellow 34.

Bonnell Aluminum is also committed to compliance with specific State obligations within the United States. **California Proposition 65<sup>v</sup>** 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 additional chemicals listed under California Proposition 65.

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 **PFOS<sup>vi</sup>** or **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

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<sup>i</sup> 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 June 25, 2020.

<sup>ii</sup> 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.

<sup>iii</sup> 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.

<sup>iv</sup> 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.

<sup>v</sup> 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). The current California Proposition 65 list is dated January 03, 2020.

<sup>vi</sup> Perfluorooctanesulfonic acid (conjugate base perfluorooctanesulfonate) (PFOS): After PFOS was added to the Annex B of the Stockholm Convention in 2009, the European Commission removed PFOS from REACH Annex XVII and added it to the Annex I of the Regulation (EC) No 850/2004 of the European Parliament and of the Council on persistent organic pollutants. PFOS is now regulated as a persistent organic pollutant (POP) in EU. PFOS is not entirely banned in EU. Its restriction conditions are set by EU 757/2010 amending the Annex I of the Regulation EC 850/2004 on POPs. The restriction of PFOS in finished and semi-finished products is less than 0.1 % by weight calculated with reference to the mass of structurally or micro-structurally distinct parts that contain PFOS. Perfluorooctanoic acid (PFOA) and its salts are suspected to have a similar hazard profile to PFOS. It was added to REACH Annex XVII restricted substances in June 2017.