

Manufacturer's declaration

Manufacturer's declaration on material conformity within the meaning of applicable EU harmonisation legislation and non-European regulations, for the protection of persons and the environment by chemical substances

1. EU harmonisation legislation

RoHS

The directive no. 2011/65/EU, also known as the RoHS Directive, regulates the requirements for the use of certain dangerous substances in electrical and electronic equipment. This European directive is implemented in Germany by the directive "Elektro- und Elektronikgeräte-Stoff-Verordnung (ElektroStoffV)". The directive states that electrical and electronic equipment may only be placed on the market if the requirements of § 3 (1) are met.

Through the delegated directive EU 2015/863, the inclusion of four additional substances in Annex II of the EU Directive 2011/65/EU was decided and published on June 4, 2015. This results in the following complete list of substances subject to restrictions in accordance with Article 4 (1) of EU Directive 2011/65/EU, with details of the maximum permissible concentrations in homogeneous materials in per cent by weight:

- Lead		(0,1 %)
- Mercury		(0,1 %)
- Cadmium		(0,01 %)
- Hexavalent chromium		(0,1 %)
- Polybrominated biphenyls	(PBB)	(0,1 %)
- Polybrominated diphenyl ethers	(PBDE)	(0,1 %)
- Bis(2-ethylhexyl) phthalate	(DEHP)	(0,1 %)
- Butyl benzyl phthalate	(BBP)	(0,1 %)
- Dibutyl phthalate	(DBP)	(0,1 %)
- Diisobutyl phthalate	(DIBP)	(0,1 %)

We hereby confirm the conformity of our products with the following legal regulations: Directive 2011/65/EU, Delegated Directive (EU) 2015/863 as well as the German ElektroStoffV. This, as well as the explicitly stated CE Declaration of Conformity, accordingly covers the substance restrictions in accordance with Annex II of Directive 2011/65/EU in the version of Delegated Directive (EU) 2015/863, as well as the currently valid delegated acts on exemptions in accordance with Annexes III and IV, insofar as they are relevant to our products.

REACH

Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) obligates all suppliers of articles to inform their customers about the substances of very high concern (SVHC) contained in the articles if one of these substances is contained in a concentration of more than 0.1 mass percent (w/w) according to Art. 33 Para. 1. In the sense of REACH, BACHMANN is a 'downstream user' (according to Art. 3 No. 13).

REACH does not foresee any form of declaration of conformity. Instead, the regulation contains a specific obligation to provide information, which requires active notification by companies along the supply chain.

Correspondingly our suppliers are generally obliged to inform us without being asked and without delay if a substance subject to authorisation or an SVHC substance according to the currently valid ECHA list is present in a product supplied to BACHMANN with more than 0.1% by mass.

In our own interest, we are also in regular contact with our suppliers in order to obtain up-to-date information on the registration status of the raw materials. Based on the current information from our suppliers, we can assume that our products do not contain any substances subject to authorisation or substances of very high concern on the current SVHC list in concentrations of more than 0.1% by mass.

Should we have any new findings regarding our products, we will inform you and take appropriate measures. We hereby declare our compliance with Regulation (EC) 1907/2006.

PAK

With Commission Regulation (EU) No. 1272/2013, Annex XVII of the REACH Regulation (EC) No. 1907/2006 was amended with regard to polycyclic aromatic hydrocarbons (PAHs). This regulation sets restrictions for certain PAHs in articles, particularly in rubber and plastic components of consumer products in which PAHs may occur as impurities. We hereby confirm that our products comply with the requirements of Regulation (EU) No. 1272/2013 and meet the limit values specified therein for the PAHs concerned.

POP

The Regulation (EU) 2019/1021 on persistent organic pollutants (POPs) lays down binding prohibitions and restrictions for certain long lasting organic pollutants. Persistent organic pollutants (POPs), as listed in Regulation (EU) 2019/1021, can:

- remain in the environment for long periods and are hardly biodegradable,
- bioaccumulate in living organisms through food chains,
- accumulate in terrestrial and aquatic ecosystems,
- be transported across international borders through air, water, and migratory species and be deposited far from their original release sites,
- cause harm to human health and the environment.

The Regulation implements the European Union's obligations under the Stockholm Convention on Persistent Organic Pollutants, which was adopted on 22 May 2001 and entered into force on 17 May 2004. Based on the information available to us, we confirm that our products comply with the requirements of Regulation (EU) 2019/1021 and do not contain any substances falling under the POP provisions of Annexes I or II.

PFAS (Per- and polyfluoroalkyl substances)

BACHMANN is aware of the environmental hazards associated with PFAS, as this substance group is extremely persistent due to its exceptional chemical stability, is hardly degradable, and can accumulate in the environment, water, soil, and living organisms. Several PFAS are increasingly being classified as environmentally and human-health-hazardous substances. We therefore support all ongoing EU initiatives to restrict the use of PFAS under the REACH Regulation.

Since January 2023, a comprehensive proposal for a universal PFAS restriction has been under evaluation within the EU. European authorities have been working on the scientific assessment of this proposal ever since. Despite several revisions and updates, including those published in August and December 2025, no final regulation has yet been adopted by the Council and the European Parliament, and no date of entry into force exists at this time. ECHA has confirmed that its scientific committees (RAC and SEAC) are expected to deliver their final opinions during 2026. Only thereafter can the European Commission issue a legally binding restriction decision.

A reliable and legally sound assessment of PFAS in components, parts, and end products will only be possible once:

- the final version of the REACH PFAS restriction, including a binding substance list, is published,
- transition periods, exemptions, and permissible limit values have been defined, and
- our supply chain can conduct a complete assessment based on the final list.

Accordingly, BACHMANN will carry out its assessment in due time upon entry into force of an EU PFAS restriction or within any transition periods that may be provided. Only after publication of a final, legally valid PFAS substance list can we issue reliable and binding statements regarding the PFAS compliance of our products. Until then, we will continue to supply our products with the known and documented material properties.

2. Regulations outside of EU legislation

UK RoHS

The currently valid UK RoHS Regulation 2012 No. 3032 regulates the placing on the market and use of certain hazardous substances listed in Schedule A1 in electrical and electronic equipment. Regulation 2020 No. 1647 of 17 December 2020 added various hazardous substances to Schedule A1.

We hereby confirm, based on the information available to us from our suppliers, the conformity of our products with the following legal regulations **Regulation 2012 No. 3032 & Regulation 2020 No. 1647** supplementing or amending the UK RoHS

UK REACH

Following the Brexit transition period, the UK chemical regulation, UK REACH came into force on 1st January 2021.

We are committed to informing our customers about the chemical substances in our products in accordance with the UK REACH regulation. In addition, we will inform our customers if a substance of very high concern (SVHC) has been placed on the UK REACH Candidate List and if it is present in any of our articles in concentrations above 0.1% (w/w).

We have no supplier information on the use of SVHC substances in a concentration of more than 0.1% weight by weight (w/w) in our products and hereby declare ourselves compliant with the **UK REACH regulation**.

Person	Function	Date	Signature
Tobias Schäfer	Head of Global Quality & Product Compliance	02.03.2026	
Simon Storzer	Product Compliance Manager	02.03.2026	

Note on duty to inform and scope of application:

All information provided in this declaration is based on our current knowledge and experience. No warranty or liability can be accepted for factors beyond our knowledge and control, particularly with regard to the further processing of this declaration. Each user of this declaration is therefore responsible for checking the intended area of application and the respective intended use, taking into account any specific particularities. Users of this document are obliged to inform themselves about the current status. Compliance with the current version of the document is binding for the user on the part of BACHMANN GmbH. Adjustments and updates are made by the Quality/Product Compliance department of BACHMANN GmbH.