

Customer information on Material Compliance (RoHS, REACH, OzDS, POP, conflict minerals)

RoHS Directive 2011/65/EU, Delegated Directive EU 2015/863

The existing list of known restricted materials (Pb, Hg, Cd, Cr6+, PBB, PBDE) was expanded on 22 July 2019 to include four additional materials (DEHP, BBP, DBP and DIBP). Furthermore, the previous range of 10 categories has been expanded to include Category 11, which applies to ESCHA GmbH & Co. Kg (hereinafter ESCHA). On the basis of the results of regular conformity surveys of our supply chain, we can confirm conformity with the prohibited materials defined by the directive.

We will be glad to provide you with relevant written product-specific documentation on request.

REACH Directive (EC) No. 1907/2006

ESCHA is a manufacturer of high-quality connector and housing technology. According to the REACH Directive, goods delivered by ESCHA are categorized as “products” (cp. Art. 3, para. 3 of the REACH Directive) and therefore are not subject to registration, evaluation or approval. Under normal conditions of use, no chemical substances are released by our products (cp. Art. 7, para. 1 of the REACH Directive).

Regarding registration and compliance with the requirements for the raw materials used we are in constant contact with our suppliers, who assure us that they fulfil all relevant REACH obligations.

According to current knowledge ESCHA does not process any substances in products that must be reported to the European Chemicals Agency (ECHA) in accordance with Article 7, para. 2.

The European Chemicals Agency (ECHA) has published on its website a list of Substances of Very High Concern (SVHC) that fulfil the criteria stated in Article 57 of the REACH Directive and have been identified in accordance with Article 59 of the REACH Directive.

More information about the **REACH Candidate List** is available [here](#).

Information obligation in accordance with Article 33, REACH

As a supplier of a product, ESCHA is obligated in accordance with Article 33, para. 1 of the REACH Directive to inform customers if the products delivered contain one or more substances in the “SVHC Candidate List” with a concentration of more than 0.1 weight % (w/w) respectively per sub-product.

In accordance with the resolution of the ECHA Member State Committee (MSC), lead was also added to the SVHC Candidate List.

In the event that lead will nevertheless become subject to approval, a transition period is in effect until the year 2024. It can be assumed that corresponding approvals will be granted by the Chemicals Agency, particularly as a substitution of the machining brass containing lead is not feasible with state-of-the-art technology.

Notice concerning lead (Pb), CAS no. 7439-92-1

Lead (Pb) was added to the SVHC list in June 2018. This means that all exceptions relating to lead (Pb) on the basis of RoHS Directive 2011/65/EU, Annex III and IV are now subject to the information obligation in accordance with Article 33, REACH.

ESCHA products can contain sub-products with lead (Pb) in a concentration of more than 0.1 weight % (w/w) respectively per sub-product.

With respect to the machinability of our products made of brass, the raw materials have a maximum lead content of 3%. This currently applies to sub-products with exceptions according to RoHS Directive 2011/65/EU, Annex III, 6c.

We will be glad to provide you with relevant written product-specific documentation on request.

Restriction of substances, REACH, Annex XVII

Suppliers of ESCHA are obligated to comply with the restrictions stated in Annex XVII of the REACH Directive for the manufacture, marketing and use of substances and mixtures. ESCHA regularly reviews the restrictions on substances in accordance with Annex XVII for updates.

Based on the currently available information, ESCHA products fulfil the requirements of Annex XVII.

POP Convention

The Stockholm Convention on Persistent Organic Pollutants (POP Convention) has been adopted at the national level by diverse states. In the European Union this is regulated by Directive (EC) No. 850/2004.

Based on the currently available information, ESCHA does not use any of these substances in products, nor are they knowingly added.

OzDS, Montreal Protocol

Substances that result in ozone layer depletion (OzDS) are defined by an international convention in the Montreal Protocol. In the European Union this is regulated by Directive (EC) No. 2037/2000.

According to currently available information, ESCHA does not use any of these substances in products, nor are they knowingly added.

Conflict minerals

“Conflict minerals” are defined as minerals that are extracted illegally and beyond governmental control in the eastern provinces of the Democratic Republic of the Congo (DRC) and bordering countries, the revenue from which is given directly or indirectly to rebels or militia involved in civil wars in these regions.

In August 2012 the US Securities and Exchange Commission (SEC) confirmed the final rule on the procurement of conflict minerals as defined in the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 (HR4173). This requires that listed US companies and their suppliers ensure that no conflict minerals, such as cassiterite (tin), coltan (tantalum), wolframite (tungsten) or gold enter their supply chain.

ESCHA supports this legislature, the efforts of the Electronic Industry Citizenship Coalition (EICC) and the Global e-Sustainability Initiative (GeSI), which require the exercise of due diligence by companies with respect to their supply chains. The purpose of this is to ensure that no products from mines in the respective “conflict regions” controlled by non-governmental organizations enter the supply chain.

In view of this obligation, ESCHA is working together with its suppliers to trace the materials in all products, in order to determine whether minerals from mines or melt shops in the conflict regions are used in ESCHA products. For this purpose, ESCHA uses the standardized template in accordance with the RMI reporting standard (CMRT) to document and monitor the use of materials and the activities of the suppliers in this regard.

ESCHA does not knowingly use any materials from the conflict regions in the company’s own products.

The ESCHA “US Conflict Mineral Policy” is available to you for download from our website. You can access the download area [here](#).

This customer information is based on current knowledge and legislature as of the date of issue. New information on Material Compliance will be published promptly on the ESCHA website in the event of any changes and will supersede earlier information.

If you have any questions, please contact compliance@escha.net

With best regards from Halver
ESCHA GmbH & Co. KG

Achim Rudack
Compliance Officer