

INVENTRONICS (HANGZHOU) Inc.

Declaration of Conformity: Substances in Products

Legal Requirements and Standards for the market

Declaration Scope:

Products of INVENTRONICS (HANGZHOU) Inc.

Placing on the market of products is subject to specific regional (such as the EU) or national legal requirements. Within the EU, these legal requirements are defined in EU-Regulations which are directly enforceable in the Member States or in EU- Directives which require a transformation into Member States' national legal systems. Compliance with the applicable legal requirements is obligatory for every party putting products on the EU-Market. Therefore, INVENTRONICS bears responsibility.

The following Directives and Regulations restrict the use of hazardous substances in products and packaging:

- **Directive 2011/65/EU ("RoHS")**
(see also https://ec.europa.eu/environment/topics/waste-and-recycling/rohs-directive_en
RoHS conformity is also part of the below mentioned CE labelling scheme)
- **Directive 94/62/EC ("Packaging Directive")**
- **REGULATION (EU) 2023/1542 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/EC**
- **Regulation (EC) No 1907/2006 ("REACH")** including declaration of "Substances of Very High Concern" and restriction of certain substances
- **Regulation (EU) 2019/1021 (Persistent Organic Pollutants, POP)** and subsequent amendments:
 - COMMISSION DELEGATED REGULATION (EU) 2023/1608 of 30 May 2023 amending Annex I to Regulation (EU) 2019/1021 of the European Parliament and of the Council as regards the listing of perfluorohexane sulfonic acid (PFHxS), its salts and PFHxS-related compounds
- **Directive 2008/98/EC (Waste Framework Directive)** incl. amendment EU 2019/851 referring to the SCIP database (Substances of Concern in Products) of the European Chemical Agency (ECHA)

The CE mark on our products indicates conformity with Directives and Regulations covering product safety, electromagnetic compatibility and product performance. Conformity with the following and all other CE relevant regulations is attested in separate EC Declarations of Conformity:

- Directive 2014/35/EU ("Low Voltage Directive - LVD"), Recast of 2006/95/EC
- Directive 2014/30/EU ("Electromagnetic Compatibility Directive - EMC") Recast of 2004/108/EC
- Directive 2014/53/EU Radio Equipment Directive (RED)
- Directive 2009/125/EC ("Energy related Products" Framework Directive) and its Implementing Measures:
 - Regulation (EU) 2019/2020 Ecodesign requirements for light sources and separate control gears
 - Regulation (EU) 2019/2015 Labelling requirements for light sources (Energy Labelling Regulation)

INVENTRONICS (HANGZHOU) Inc.

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INVENTRONICS (HANGZHOU) Inc. declares:

- Products, put in the EU-Market today and in the future by any of the subsidiaries of Inventronics (Hangzhou) Inc., satisfy the applicable legal requirements, as well as the applicable product standards (EN/IEC).
- Compliance to applicable legal requirements is ensured through systematic feedback from our partners and suppliers, rigorous utilization of our processes, laboratories and integrated tools that manage pertinent information of products, parts and materials procured from suppliers.
- According to Directive 2011/65/EU ("RoHS") including amendment of Annex II (2015/863/EU), INVENTRONICS (HANGZHOU) Inc. products delivered into EU market do not contain the following substances exceeding defined maximum concentration values, unless in an application exempted by Annex of RoHS Directive (incl. amendments).

Substances / application	Maximum concentration values by weight in homogeneous materials
Lead (Pb)	0.1 %
Mercury (Hg)	0.1 %
Cadmium (Cd)	0.01 %
Hexavalent chromium (Cr ⁶⁺)	0.1 %
Polybrominated biphenyls (PBB) Polybrominated diphenyl ethers (PBDE)	0.1 %
Bis(2-ethylhexyl) phthalate (DEHP)	0.1 %
Benzyl butyl phthalate (BBP)	0.1 %
Dibutyl phthalate (DBP)	0.1 %
Diisobutyl phthalate (DIBP)	0.1 %

- According to the REACH Regulation the Candidate List of substances of very high concern (**253** SVHC) is published by ECHA (European Chemicals Agency). As required by Article 33 Inventronics (Hangzhou) Inc. will inform customers, if certain products or its packaging contain one or more of these substances in a concentration exceeding 0.1% weight per article, as soon as we become aware of the fact. More information can be found under <https://echa.europa.eu/de/candidate-list-table>
- In full accordance to the European Waste Framework Directive (including its Amendment (EU) 2018/851), Inventronics (Hangzhou) Inc. is declaring products containing SVHC in the [SCIP database of ECHA](#) (Substances of Concern In Products). In most cases the EAN10 is the Primary Article Identifier. Inventronics' products can contain the SVHC Lead (EC 231-100-4, CAS 7439-92-1). The products are safe for the user, no special safety requirements apply unless otherwise mentioned. The use of lead is restricted by RoHS Directive (2011/65/EU) and allowed in exempted applications according to Annex III.
- Inventronics will carefully monitor the legislation process for PFAS irrespective of the market and will take every necessary measure to fulfil upcoming legal requirements for products, processes and production equipment.

For more information please visit our Sustainability webpage: <https://www.inventronics-light.com/sustainability>

or contact your respective Inventronics Sales representative.

INVENTRONICS (HANGZHOU), INC.

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The information provided in this statement represents our knowledge and belief as of the date that it is provided. We base our knowledge and belief on information provided by third parties and make no representation or warranty as to the accuracy and shall have no liability for the consequences of use of such information. We have taken and continue to take reasonable steps to provide representative and accurate information but may not have conducted destructive testing or chemical analysis on incoming materials and chemicals. We and our suppliers consider certain information to be proprietary, and thus CAS numbers and other limited information may not be available for release.