

Febrotec GmbH		Material Compliance		
www.febrotec.com		Certificates	Version	6.32

Front Page

I.	Company Profile
II.	RoHS Conformity with EU Directive 2011/65/EU
III.	China RoHS 2 Conformity / GB/T 26572-2011
IV.	REACH Conformity with EU Regulation (EC) No 1907/2006 EU
V.	The Waste Framework Directive (EC) 2018/851
VI.	POP-Regulation (EU) 2019/1021
VII.	EC Dual-Use Regulations 2021/821
VIII.	EPA TSCA 6(h) PBT (Toxic Substances Control Act)
IX.	EPA TSCA (Toxic Substances Control Act)
X.	PFAS (Per- and polyfluoroalkyl substances)
XI.	CA Prop65
XII.	GADSL (Global Automotive Declarable Substance List)
XIII.	Conflict Minerals CMRT 6.5
XIV.	Extended Minerals EMRT 2.0

This declaration has been drawn up by machine; it is therefore not signed by hand and is deemed to be a declaration of commitment within the meaning of Article 63 (3) of the DVO (EU) No. 2015/2447.

Best regards

Dipl.-Ing Jens Schlabach
(Managing Partner)

Jesper Dietrich, M.Sc.
(Managing Director)

Released: 27 August 2021	Compiled: 19 August 2021	Updated: 20 April 2026
Jens Schlabach	Ulrike Schielke	Page 1 of 6



Febrotec GmbH		Material Compliance		
www.febrotec.com		Certificates	Version	6.32

I. Company Profile

Febrotec GmbH is a leading distributor of technical springs and engineered components in Germany with an extensive product range, shipping to more than 70,000 customers worldwide.

We see it as our duty to ensure that all raw materials are used responsibly in the production of our springs. All our standard springs comply with the legal environmental and health requirements and do not contain any materials that have been used to fund or support armed groups in conflict areas through mining and trade.

We deliver our products exclusively to our terms and conditions and we expressly object to any additional or different terms and conditions of sale. As a matter of principle, we will neither sign nor accept any other documents, contracts or agreements.

Contact

Febrotec GmbH
Frankfurter Strasse 76
58553 Halver
Germany

Phone: +49 (0)2353 - 4098

Fax: +49 (0)2353 - 4301

E-mail: federn@febrotec.de

Homepage: www.febrotec.com

Released: 27 August 2021	Compiled: 19 August 2021	Updated: 20 April 2026
Jens Schlabach	Ulrike Schielke	Page 2 of 6

Febrotec GmbH		Material Compliance		
www.febrotec.com		Certificates	Version	6.32

Declaration

II. RoHS Conformity with EU Directive 2011/65/EU

All products supplied by Febrotec meet the requirements of the EU Directive 2011/65/EU (RoHS / 2015/863). They do not contain substances, or do not contain more than 0,1 % (cadmium 0,01 %) of the mass substances, which are listed under article 4 of the above-mentioned directive.

III. China RoHS II / GB/T 26572-2011

All products supplied by Febrotec meet the requirements of the China RoHS II. They do not contain substances, or do not contain more than 0,01% cadmium (Cd), 0,1% of the mass substances: lead (Pb), mercury (Hg), hexavalent chromium (Cr6+), polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE), bis(2-ethylhexyl) phthalate (DEHP), Butyl benzyl phthalate (BBP), dibutyl phthalate (DBP), diisobutyl phthalate (DIBP).

IV. EU REACH Regulation (EC) No 1907/2006

All products supplied by Febrotec comply with the EU REACH regulation (EC) No 1907/2006, Annex XIV of February 4th, 2026 and meet the requirements of the current "Candidate List" SVHC containing 253 substances that must be registered according to the EU Chemicals Regulation (EC) 1907/2006 (REACH). This also includes the restrictions set out in Annex XVII, according to Article 9(2) of Directive 2008/98/EC and Annex XIV of the substances subject to authorisation, according to Regulation (EU) No. 2022/586 of 08.04.2022. We have determined to the best of our knowledge that none of the products supplied by Febrotec contain substances with a concentration of more than 0,1% (weight by weight) listed in the latest SVHC-candidate list containing 253 substances published in accordance with Article 59 (10) of the Reach Regulation (current candidate list: <https://echa.europa.eu/en/candidate-list-table>).

Further, this also includes compliance with the use of prohibited substances classified as P(AR) in the Railway Industry Substance List (RISL).

V. The Waste Framework Directive (EU) 2018/851 amending Directive 2008/98/EC on waste

Febrotec GmbH is aware of the mandatory legislative requirement of the EU Waste Framework Directive (WFD) 2018/851/EG amending Annex XVII, Article 9, Paragraph 2 of Regulation 2008/98/EC and is taking the necessary action to submit information of articles containing

Released: 27 August 2021	Compiled: 19 August 2021	Updated: 20 April 2026
Jens Schlabach	Ulrike Schielke	Page 3 of 6

Febrotec GmbH		Material Compliance		
www.febrotec.com		Certificates	Version	6.32

substances of very high concern (SVHC) in a concentration above 0.1% weight by weight (w/w) on the EU market, to the ECHA database SCIP, as from 5th January 2021.

VI. POP-Regulation (EU) 2019/1021

All products and packaging supplied by Febrotec meet the requirements of Regulation (EU) 2019/1021 of the European Parliament and of the Council of 20th June 2019 and do not contain any persistent organic pollutants from the current 'POP Regulation'. Amendments include Regulation (EU) 2024/2570 of the European Parliament and of the Council of 26th November 2025 amending Regulations (EC) No 178/2002, (EC) No 401/2009, (EU) 2017/745 and (EU) 2019/1021.

VII. Dual-Use

Definition

Control of exports, transfer, brokering and transit of dual-use items according to the following regulations:

Council Regulation (EC) No.2021/821

Confirmation

We confirm that for all our products no export licences or export permissions for dual-use items are required. The goods are not listed on the following export list:

Appendix I of the EC Regulation according to EC Dual-Use Regulations 2021/821

VIII. EPA TSCA 6(h) PBT

All products supplied by Febrotec meet the requirements of the United States Environmental Protection Agency (EPA) and do not contain any of the Persistent, Bioaccumulative, and Toxic (PBT) substances and mixtures of The Toxic Substances Control Act (TSCA) under Section 6 (h): Decabromodiphenyl ether; Decabromodiphenylether; Deca BDE (CAS No. 1163-19-5); Phenol, isopropylated; phosphate 3:1; Phenol, isopropyliert; Phosphat (3:1); PIP 3:1 (CAS No. 68937-41-7); Hexachlorobutadiene; Hexachlorbuta-1,3-dien; Hexachlorbutadien; HCBd (CAS No. 87-68-3).

Our products do not contain 2,4,6-Tris(tert-butyl)phenol; 2,4,6-Tris(1,1-dimethylethyl)phenol; 2,4,6-TTBP) (CAS No. 732-26-3) as an additive in oil or lubricants, in amounts greater than 0.3 % by weight, and Pentachlorothiophenol; Pentachlorbenzolthiol; PCTP (CAS No. 133-49-3), in amounts greater than 1% by weight.

Released: 27 August 2021	Compiled: 19 August 2021	Updated: 20 April 2026
Jens Schlabach	Ulrike Schielke	Page 4 of 6

Febrotec GmbH		Material Compliance		
www.febrotec.com		Certificates	Version	6.32

IX. EPA TSCA Toxic Substances Control Act

All products supplied by us meet the requirements of the United States Environmental Agency (EPA) Section 6 and do not contain asbestos, lead, polychlorinated biphenyl (PCBs), dioxins, chlorofluorocarbons (CFCs, ozone depleting substances), metallic mercury, formaldehyde, nitrites, and hexavalent chromium compounds.

X. PFAS (Per- and polyfluoroalkyl substances)

None of the products supplied by Febrotec contain any PFAS compounds.

XI. California Proposition 65 – Safe Drinking Water and Toxic Enforcement Act of 1986

All standard products supplied by Febrotec are made from patented drawn music wire (spring steel) (1.1200, 1.211, 1.8159), cold-rolled music wire (spring steel) (1.1231, 1.1248, 1.1269) or stainless steel (1.4310, 1.4568) and meet the Safe Harbor requirements of The Safe Drinking Water and Toxic Enforcement Act of 1986, Proposition 65, version 12/2025. No Febrotec products contain chemicals from the list of chemicals on the Proposition 65 list, Version 12/2025, effective from January 3, 2026.

XII. GADSL

None of the products supplied by Febrotec contain any GADSL substances.

XIII. Conflict Minerals CMRT 6.5

Sec. 1502 Dodd-Frank Act and EU Regulation for Conflict Minerals

The raw materials, tantalum, tin, tungsten, their ores, and gold, often referred to as 3TG metals, are increasingly used in consumer products, electronic devices, and wires. 3TG metals are designated as ‘conflict minerals’ through mining and trading to fund or support armed groups in the Democratic Republic of Congo (DRC) or its neighbouring countries.

The organization, Conflict-Free Sourcing Initiative (CFSI) has developed a Conflict Minerals Reporting Template (CMRT) to facilitate the collection of data on conflict minerals. The Dodd-Frank Act has been legally binding since July 2010 and includes Section 1502 that requires companies to ensure that their minerals have been sourced responsibly and do not originate from the Democratic Republic (DR) of Congo or its neighbouring countries. Since January 2021, companies can be asked by their customers or suppliers to provide evidence of their due diligence at various points in the supply chain to ensure that their supply chains do not help to fund armed conflict.

Released: 27 August 2021	Compiled: 19 August 2021	Updated: 20 April 2026
Jens Schlabach	Ulrike Schielke	Page 5 of 6

Febrotec GmbH		Material Compliance		
www.febrotec.com		Certificates	Version	6.32

None of the standard products supplied by Febrotec contains the raw materials tantalum, tin, tungsten, their ores, and gold.

XIV. Extended Minerals EMRT

None of the standard products supplied by Febrotec contains the raw material cobalt and mica, lithium, copper, graphite and cobalt.

XV. The European Critical Raw Materials Act (CRMA) (EU) 2024/1252

All products supplied by Febrotec meet the requirements of the EU Directive 2024/1252/EU. They do not contain any critical raw materials like lithium, rare earths, cobalt, and bauxite.

Released: 27 August 2021	Compiled: 19 August 2021	Updated: 20 April 2026
Jens Schlabach	Ulrike Schielke	Page 6 of 6