

MANUFACTURER'S DECLARATION



Translation of original document

US Toxic Substances Control Act 1976 (TSCA) amended by The Frank Lautenberg Chemical Safety for the 21st Century Act 2016 based on the United Nations Globally Harmonized System (UN GHS), in combination with related EU regulations:

- **No. 1907/2006 REACH (Registration, Evaluation, Authorization and Restriction of Chemicals) and its national implementation**
- **No. 1272/2008 CLP (Classification, Labeling and Packaging of Substances and Mixtures)**
- **No. 2019/1021 POP (Persistent Organic Pollutants) relevant to climate protection**

We confirm that SAMSON AG is well informed about the final rules of the following five substances since 6 January 2021 and has determined the applicable consequences and obligations, especially concerning the restrictions effective as of 8 March 2021:

Abb.	Chemical substance	CAS no.	Sample applications	Listed in other legislation?			
				CP 65	REACH Regulation	RoHS Directive	POP
PIP 3:1	Phenol, isopropylated phosphate (3:1)	68937-41-7	Flame retardant in PVC, PU foam, BPA epoxy resins (ISO 1043: FR40), plasticizer	No	No	No	No
	US ban effective 8 March 2022						
DekaBDE	Decabromodiphenyl ether	1163-19-5	Flame retardant	No	Yes	Yes	Yes
	Completely banned since 8 March 2021						
2,4,6 TTBP	2,4,6-tri-tert-butylphenol	732-26-3	Antioxidants, lubricants, fuel additive (no restricted use in products!)	No	No	No	No
	As of 6 January 2026, banned use at concentrations above 0.3 % w/w in any container with a volume of less than 35 gallons						
HCBD	Hexachlorobutadiene	87-68-3	Hydraulic fluid, heat transfer liquid or transformer fluid	Yes	No	No	Yes
	Completely banned since 8 March 2021						
PCTP	Pentachlorothiophenol	133-49-3	Plasticizer, peptizer to make rubber more pliable (core of golf balls, vibration dampers for heavy equipment), butadiene rubber (SBR, NBR etc.) or isoprene rubber	No	No	No	No
	Banned use at concentrations above 1 % w/w since 8 March 2021						
Are the chemical substances already listed in other legislation? REACH: see above, RoHS: Directive 2011/65/EU, Annex III, POP: see above, CP 65: California Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986)							



Since 4 September 2021, *no action assurance* no longer applies to PIP 3:1. PIP 3:1 will be banned in the USA as of 8 March 2022. Restrictions concerning 2,4,6 TTBP in products will apply in the USA as of 6 January 2026. We manufacture "articles" as defined in the US TSCA; as a result, we are a "downstream user" in most cases. We do not produce and sell any substances or mixtures.

Based on the latest data, we currently do not regard our supply chains to the USA to be affected by the restricted use of relevant substances required to manufacture our products.

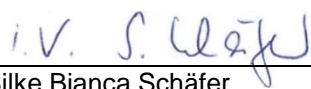
We require the following details to process inquiries about products or deliveries:

- Delivery note or invoice
- Order item

Content of PBT substances (persistent, bioaccumulative and toxic) of very high concern

In compliance with US TSCA, we have a duty to inform our customers. SAMSON calculates the content of declarable substances in every individual article (e.g. nuts, bolts etc.) included in a bill of materials separately. The declarable PBT substances are usually classified as chemical substances and mixtures in the UN GHS. The legal requirements on PBT substances affects the Safety Data Sheets (SDS) for chemicals and chemical mixtures as well as the SAMSON Material Data Sheets (MDS) for declaring the material and substance content. As a result, it is an on-going process to check whether our products contain a PBT substance in a concentration greater than 0.1 % (w/w). We are in close contact with our suppliers as part of this process. Furthermore, we list appropriate measures to protect against these substances, where applicable.

SAMSON AKTIENGESELLSCHAFT



Silke Bianca Schäfer

Director, Quality Management
Integrated Management System



Dirk Hoffmann

Director, R&D, Organization