Supplier Material Regulatory Compliance Declaration

(RoHS / REACH / TSCA / POPs / Proposition 65)

1. Supplier

TOROLA electronic spol. s r.o.,
Nadrazni 906 Frenstat pod Radhostem, 74401 Czech Republic, ID Number 42767555
The company is registered in the Commercial Register maintained by the Regional Court in Ostrava, Section C, Insert 1966.

2. Supplier identification

TOROLA electronic spol. s r.o. acts as a contract manufacturer (EMS provider) providing electronic manufacturing services according to customer documentation and specifications.

This declaration is issued under the sole responsibility of TOROLA electronic spol. s r.o.

3. Scope of declaration

This declaration applies to:

Electronic assemblies (PCB assemblies) and related products manufactured by TOROLA electronic spol. s r.o. according to customer design documentation.

TOROLA electronic spol. s r.o. confirms that:

- only components declared as compliant by qualified suppliers are used,
- manufacturing materials comply with applicable regulatory requirements,
- no prohibited substances are intentionally introduced into manufacturing processes,
- PFAS substances are not intentionally added to production processes,
- chemical substances are handled in accordance with applicable legislation,
- environmental and chemical management procedures are implemented.

Material compliance is evaluated based on:

- supplier declarations,
- material declarations,
- Safety Data Sheets (SDS),
- technical documentation,
- supplier compliance statements.

This declaration is issued in good faith based on currently available information.

Unless specifically requested by the customer:

- destructive testing is not performed,
- chemical laboratory analysis is not routinely performed,
- absence of trace substances cannot be absolutely guaranteed.

3.1 Specification of the scope of the declaration

None.

4. EU RoHS Declaration

(Directive 2011/65/EU and Directive (EU) 2015/863)

TOROLA electronic spol. s r.o. declares that supplied products are manufactured using components declared by their manufacturers as compliant with RoHS requirements.

4.1 Based on supplier information:

Based on current supplier declarations and available technical documentation, the components and materials used comply with the relevant maximum concentration values set out in Directive 2011/65/EU, as amended, in homogeneous materials, or are used within the scope of the applicable exemption according to Annex III or IV of the Directive.

RoHS exemptions applicable to the products covered by this declaration:
None.

TOROLA electronic spol. s r.o. relies on supplier declarations regarding exemption usage.

5. REACH Declaration

(Regulation EC 1907/2006)

TOROLA electronic spol. s r.o. confirms that REACH requirements are addressed through supplier material compliance processes.

Based on current supplier declarations and available technical information, no constituent article/component of the products covered by this declaration has been identified as containing a substance included on the current REACH Candidate List in a concentration above 0.1 % w/w.

Where a Candidate List substance is identified above 0.1 % w/w in a constituent article/component, TOROLA will provide the information required under Article 33 of Regulation (EC) No 1907/2006 and will assess the applicability of SCIP obligations.

TOROLA electronic spol. s r.o. does not intentionally introduce SVHC substances during manufacturing.

6. SCIP obligations

SCIP obligations are assessed according to TOROLA's actual legal role in the supply chain and according to whether the relevant article or complex object containing a Candidate List substance above 0.1 % w/w is placed on the EU market by TOROLA.

Where TOROLA is not the party responsible for the SCIP notification, TOROLA provides the responsible party with the information required for fulfilment of the SCIP obligations.

Where TOROLA itself has a SCIP notification obligation, the notification is submitted in accordance with applicable requirements.

7. TSCA Declaration

(Toxic Substances Control Act – Section 6(h))

Based on current supplier declarations and available material information, TOROLA confirms that the products covered by this declaration comply with applicable TSCA Section 6(h) requirements for the intended use and applicable US market requirements.
The assessment covers the following PBT substances regulated under TSCA Section 6(h):

- Decabromodiphenyl ether (DecaBDE),
- Phenol, isopropylated phosphate (PIP (3:1)),
- 2,4,6-Tris(tert-butyl)phenol (2,4,6-TTBP),
- Hexachlorobutadiene (HCBD),
- Pentachlorothiophenol (PCTP).

Where specific exemptions, exclusions or use-specific requirements apply, these are assessed according to the intended application and destination market.

8. California Proposition 65 Declaration

Based on current supplier information, available material data and knowledge of the intended use of the products,

TOROLA has not identified a Proposition 65 warning requirement for the products covered by this declaration.

This statement is based on available information and does not constitute a complete analytical determination of all Proposition 65 listed substances or an exposure assessment for all possible uses. Where the intended use or destination market requires a product-specific exposure assessment, the assessment shall be performed separately.

9. Persistent Organic Pollutants (POPs)

TOROLA electronic spol. s r.o. declares compliance with:

- Regulation (EU) 2019/1021 on Persistent Organic Pollutants.

Based on current supplier declarations and available technical information, the products covered by this declaration comply with the applicable restrictions and concentration limits established by Regulation (EU) 2019/1021 on persistent organic pollutants (POPs).

10. PFAS statement

TOROLA electronic spol. s r.o. declares:
Based on current supplier information and knowledge of the manufacturing processes, PFAS are not intentionally added to the products or intentionally used in the manufacturing processes. This statement does not constitute a guarantee of analytical absence of all PFAS substances.

11. Responsibility for final product compliance

TOROLA electronic spol. s r.o. acts as a contract manufacturer (EMS provider) according to customer specifications and documentation. Unless TOROLA is legally designated as the manufacturer under the applicable product legislation or has contractually assumed the relevant obligations, responsibility for

- classification of the final product,
- applicable conformity assessment,
- CE marking,
- EU Declaration of Conformity and
- placing the final product on the EU market

remains with the party acting as the manufacturer and/or placing the product on the market.

This declaration concerns material and regulatory compliance of the supplied products/components and does not constitute an EU Declaration of Conformity for the final product.

12. Limitations of declaration

This declaration is based on:

- supplier information,
- internal procedures,
- available technical documentation.

Unless otherwise stated:

- no destructive testing performed,
- no full chemical analysis performed,
- trace contamination cannot be fully excluded.

13. Validity of declaration

The declaration shall be reviewed at least annually and whenever relevant regulatory changes, supplier material changes, product changes, or customer requirements occur.

14. Authorized signatory

Frenstat pod Radhostem, 05.10.2026

TOROLA electronic spol. s r.o.

Pavel Rybiař, Quality and Environmental Manager

Signature: .....