Dear Valued Customer:

This letter provides the compliance status of EPO-TEK® products with European Union Directives 2002/95/EC (RoHS), 2011/65/EU (RoHS 2), and 2015/863 (RoHS 3)

Background

The European Union Directive 2002/95/EC (RoHS) was the initial regulation requiring heavy metals including lead, mercury, cadmium, and hexavalent chromium and flame retardants, such as polybrominated biphenyls (PBB) or polybrominated diphenyl ethers (PBDE), to be substituted by safer alternatives in electrical and electronic equipment (EEE). The Directive was published in 2002 and came into effect in 2003.

In 2011, a new RoHS directive (2011/65/EU) was introduced. This new amendment was referred to as RoHS 2. RoHS extended its' initial scope of the requirements to all EEE, cables and spare parts (to be phased in through July 2019) as well as the allowance to add new materials to the originally established listed six. In accordance with article 6(1) of the new directive (2011/65/EU), the risks to human health and the environment arising from the use of four particular plasticizing phthalates became subject to further investigation for possible future restriction. It also provided coherence with other EU legislation, such as European declaration of conformity and REACH (a general act regulating registration, evaluation, authorization and restriction of chemical substances). RoHS 2 required manufacturers, to produce documentation to ensure there are no restricted substances produced in EEE.

Directive 2015/863 was published on March 31, 2015 and became effective July 22, 2019. This revision officially added four additional phthalate substances to Annex II of 2011/65/EU. European interested parties, including economic operators, recyclers, treatment operators, environmental organizations, employee and consumer associations, were consulted and performed a thorough assessment concluding Bis(2-ethylhexyl) phthalate (DEHP), Butyl benzyl phthalate (BBP), Dibutyl phthalate (DBP) and Diisobutyl phthalate (DIBP) can have a negative impact on recycling, human health and the environment during EEE waste management operations.

Epoxy Technology, Inc. does not perform analytic testing on our products to determine any presence of the above RoHS Restricted Substances. Epoxy Technology, Inc. bases its knowledge on information provided by third parties and believes it to be true. To the best of our knowledge, the above substances are not intentionally or knowingly used as ingredients in products manufactured by Epoxy Technology, Inc. The above substances are not expected to be present above the regulated threshold limits and our manufacturing processes are not expected to introduce or create these substances.

We appreciate your business.

Sincerely,

[Signature]

Andrew R. Horne
President / COO