

Febrotec GmbH		Material Compliance		
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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)

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## 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

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## 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 0,1% of the mass substances: lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls and polybrominated diphenyl ethers.

### IV. EU REACH Regulation (EC) No 2024/1328

All products supplied by Febrotec comply with the EU REACH regulation (EC) No 2024/1328 of 16 May 2024 and meet the requirements of the current "Candidate List" SVHC from January 2025 containing 247 substances that must be registered according to the EU Chemicals Regulation (EC) 1907/2006 (REACH), concerning Bis(a,a-demethylbenzyl) peroxides including 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. This also includes compliance with the use of prohibited substances classified as P(AR) in the Railway Industry Substance List (RISL). 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 241 substances published in accordance with Article 59 (10) of the Reach Regulation (current candidate list: <https://echa.europa.eu/de/candidate-list-table>).

### 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 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.

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## VI. POP-Regulation (EU) 2023/1608

All products and packaging supplied by Febrotec meet the requirements of Regulation (EU) 2023/1608 of 8<sup>th</sup> August 2023 and do not contain any persistent organic pollutants from the current 'POP List', that was implemented in the European Union in accordance with the POP Regulation (EU) 2023/1608 in Annex 1 of 8<sup>th</sup> August 2023. Regulation (EU) 2023/1608 in Annex 1 of 8<sup>th</sup> August 2023 updates Regulation (EU) 2023/1608 of 30<sup>th</sup> May 2023, Regulation (EU) 2021/115 and (EU) 2021/277 of the entry regarding the uptake of perfluorohexane sulfonic acid (PFHxS), its salts and PFHxS-related substances.

## 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.

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## IX. EPA TSCA 6(h) 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 biphenyls (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 principal 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.

## XII. Conflict Minerals CMRT 6.4

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.

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

## XIII. Extended Minerals EMRT

None of the standard products supplied by Febrotec contains the raw material cobalt and mica.

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