

Statement on material compliance

In accordance with the company's mission statement, halstrup-walcher GmbH recognises its responsibility to protect people and the environment from harmful substances and materials.

halstrup-walcher GmbH conducts comprehensive research into the conformity of the materials used for the applications served and the regions supplied. However, halstrup-walcher is not a producer or importer of substances or mixtures. As a user of materials, substances or chemicals, the annual quantities do not exceed any of the known quantity limits, which is why halstrup-walcher is not subject to any currently known obligation to register or notify substances. Furthermore, halstrup-walcher does not distribute raw materials, auxiliary materials or supplies, but only articles (e.g. as defined in Article 3 of the REACH Regulation). This means that there is no obligation to prepare safety data sheets or similar.

The following statements are based both on our own data collection and on information from suppliers. The information reflects the best of our knowledge and the current state of knowledge. Even if halstrup-walcher considers the information provided by suppliers to be reliable, no guarantee or liability can be given for its accuracy and completeness.

In the best interests of our customers and markets, we constantly monitor changes in the regulations. With this statement, we offer you the greatest possible transparency regarding the materials used in our products and demonstrate our commitment to our customers.

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1. Statement on conflict minerals

Introduction

halstrup-walcher GmbH, halstrup-walcher S.r.l and its parent company Walcher Meßtechnik GmbH (hereinafter collectively referred to as "halstrup-walcher") recognise international human rights and support their implementation. halstrup-walcher is aware of its special social and corporate responsibility as a globally active company. For this reason, halstrup-walcher has imposed a code of conduct on itself that sets out minimum standards for responsible and sustainable cooperation. With the help of a supplier code of conduct, halstrup-walcher aims to enforce these basic principles along the entire value chain.

Conflict minerals

In the Democratic Republic of Congo and its neighbouring countries in particular, the extraction of certain raw materials is used to finance the ongoing armed conflict there. Some mines are controlled by militias that are responsible for numerous human rights violations. As a result, the United States Congress has passed the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), which, together with the implementing regulations of the U.S. Securities and Exchange Commission (SEC), obliges certain companies to submit a report on whether the products they produce or commission contain conflict minerals. In its Conflict Minerals Regulation (Regulation (EU) 2017/821), the EU also stipulates reporting and certification obligations for smelters and refineries as well as large importers of raw materials. Conflict minerals are defined as tantalum, tungsten, tin and gold (3TG minerals) as well as cobalt and mica that are extracted in the aforementioned areas, which in the case of the EU are defined by the EU Commission, under the aforementioned conditions.

halstrup-walcher is not affected by the reporting obligations, but recognises the underlying transparency objective of the Dodd-Frank Act as well as many other initiatives (e.g. the OECD) to avoid supporting armed conflicts that violate human rights by sourcing certain minerals.

Statement

halstrup-walcher aims to avoid the procurement and use of conflict minerals - whether directly, through direct procurement, or indirectly, through procurement via suppliers and products that have already been processed. Where halstrup-walcher itself sources 3TG minerals directly, this is already done via certified smelters that ensure a conflict-free origin. In addition, halstrup-walcher endeavours to raise awareness of the issue of conflict minerals among its own suppliers, who are required to take appropriate measures as part of the halstrup-walcher Supplier Code of Conduct. Information on the status of conflict minerals is communicated to the user on a product-related basis on request.

2. Statement on RoHS (EU), Directive 2011/65/EU

RoHS: Reduction of Hazardous Substances

The aim of the RoHS Directive is to reduce or avoid the use of hazardous substances that could pose a risk to people and the environment both in operation and during disposal. As there is no suitable substitute with similar properties for many substances, there are numerous exceptions. For example, substances may only be used within certain limits or for very specific applications.

The hazardous substances in halstrup-walcher's products are currently mainly lead in metal alloys (RoHS exemptions 6a, 6b and 6c). halstrup-walcher is therefore in the process of switching to lead-free alloys so that it can continue to supply RoHS-compliant products even after the exemptions have been abolished. Until the changeover has been completed, the products are also RoHS-compliant, but the applicable exemptions will be utilised for a few components.

There are a number of regulations around the world, e.g. in China, India, Korea, the USA and other countries, which are comparable to the European RoHS Directive. However, these may differ in the list of restricted substances or in the categories of equipment to which these restrictions apply. halstrup-walcher will check compliance with international regulations on request.

3. Statement on REACH (EU), Regulation (EG) No. 1907/2006

REACH: Registration, Evaluation, Authorisation and Restriction of Chemicals

The aim of the REACH regulation is to reduce or prevent the use of hazardous substances that could pose a risk to people and the environment during use, operation and disposal. The manufacture and introduction of larger quantities (≥ 1 t/a) of these substances are subject to registration. Due to this restriction, halstrup-walcher is not subject to registration. If such substances are contained in the components of upstream suppliers, halstrup-walcher assures that these have been properly registered by the upstream suppliers.

The REACH Regulation also imposes restrictions on the placing on the market of certain substances in higher concentrations. These substances are a candidate list of particularly hazardous substances (SVHC = Substances of Very High Concern). As a rule, these may not exceed 0.1 % by weight within a component (with exceptions for certain substances and for certain uses). According to Art. 33 REACH, there is a notification obligation along the supply chain.

halstrup-walcher is in constant contact with its suppliers in order to update the information on the components used. No hazardous substances are deliberately used or added during production. If halstrup-walcher receives information from upstream suppliers that the limit values for a hazardous substance have been exceeded, halstrup-walcher will fulfil its obligation to notify the customer.

4. Statement on PFAS

PFAS: Per- and polyfluorinated alkyl substances

PFAS are not added to halstrup-walcher products, nor are they used in their manufacture. However, numerous components from suppliers are incorporated into the products, not all of which have yet been confirmed by the upstream suppliers. halstrup-walcher is therefore in constant contact with its suppliers and updates its information in this regard on an ongoing basis. Should halstrup-walcher become aware of the use of PFAS, the customers of these products will be informed upon delivery. halstrup-walcher will also immediately seek agreements with upstream suppliers in order to be able to supply PFAS-free products as quickly as possible. As soon as the currently planned legal regulations come into force, halstrup-walcher will carry out a new test and confirm that its products are PFAS-free.

5. Statement on POP (EU), Regulation (EU) 2019/1021

POP: Persistent Organic Pollutants

The substances listed in the POP Regulation degrade very slowly or not at all in the environment. The directive therefore aims to restrict the release of these substances, which also applies to waste management. During production, these substances may only be used as an intermediate product and may not be placed on the market. halstrup-walcher does not produce such substances and does not use them as an intermediate product for the production of other substances.

6. Statement on global regulations

There are a number of different regulations worldwide. The following is an incomplete list of some of them:

- RoHS regulations in China, India, Korea, USA (not standardised in the federal states)
- TSCA (Toxic Substances Control Act) in the USA
- California Prop65 (special restrictions in California)

Due to the differences to the European regulations and their constant updating, no general statement can be made about compliance with such regulations. halstrup-walcher will check these on request in individual cases.

7. Statement on the EU Battery Regulation

The EU Battery Regulation contains, among other things, various regulations on the labelling of batteries, increasing the service life and power density as well as the collection of used batteries. The Battery Ordinance is primarily aimed at battery manufacturers. halstrup-walcher assumes these manufacturer obligations as the distributor if batteries or rechargeable batteries are included in the delivery of devices.

halstrup-walcher is in constant contact with upstream suppliers in order to fulfil the other obligations arising from the Battery Ordinance. The halstrup-walcher service department will be pleased to offer you the replacement of batteries and rechargeable batteries. Customers can, of course, return batteries and accumulators supplied by halstrup-walcher for disposal/recycling at any time.

You can use the return form for old electrical appliances:

https://www.halstrup-walcher.de/de/ueber-uns/WEEE_Ruecknahmekonzept_web.pdf

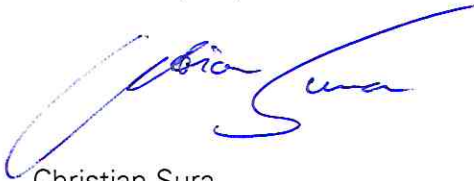
8. Statement on the return of electrical appliances WEEE Directive 2012/19/EU

WEEE = Waste of Electrical and Electronic Equipment

Due to the extension of the WEEE Directive to the B2B sector, halstrup-walcher as a manufacturer of electrical appliances is obliged to register and take back old electrical appliances. halstrup-walcher is registered with the ear foundation, WEEE-Reg-No.: 14807488. For further information, please refer to the return concept:

https://www.halstrup-walcher.de/de/ueber-uns/WEEE_Ruecknahmekonzept_web.pdf

Kirchzarten, July 2025



Christian Sura