

Confirmation of EU directives / regulations

1907 / 2006 / EC [REACH]

- HAINBUCH synthesizes no chemical substances.
- HAINBUCH does not purchase pure chemical substances.
- HAINBUCH products consist essentially of steel – not a chemical substance according to REACH.
- Some products contain NBR as a linking element. The NBR compound is purchased by HAINBUCH from suppliers in Germany and contains no vulcanization accelerators [DOTG]
- No chemical substances are imported.

HAINBUCH is therefore a “downstream user” according to REACH and is not subject to registration or any obligation to prepare safety data sheets.

2011 / 65 / EU (RoHS2) / 2015 / 963 / EU (RoHS3)

HAINBUCH is not directly affected by the provisions of the RoHS2 and RoHS3 directives of the European Union. This is because all components used in our electrical and electronic devices are purchased through local retailers and are not imported. All materials are carefully selected to ensure that the concentrations of substances specified in the RoHS directives are substantially below the specified limits. Close monitoring of compliance with all environmental and safety standards relevant to the components supplied to us additionally reduces the risk of discrepancies.

Perfluorinated and polyfluorinated chemicals [PFAS]

HAINBUCH does not purchase or process perfluorinated and polyfluorinated chemicals [PFAS] as chemical raw materials. We are aware of the concerns about environmental and health effects of PFAS and are actively committed to the use of safe and sustainable materials. Some components from other manufacturers that we use in our products may contain amounts of PFAS. This applies primarily to fluoroelastomer seals, which are used only in products that are subjected to high temperatures, aggressive chemicals, or extreme pressure conditions. These materials and products are purchased only on the local market, where stringent regulations and limits apply to the use of PFAS and their content. This means that our suppliers, who can be manufacturers or importers, are responsible for compliance with the binding obligations.

In general, the following applies: Our products release no chemical substances under normal or foreseeable conditions of use, and/or contain no hazardous substances. The products that you receive from us are exempt from registration in accordance with the above regulations.

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Proposition 65 (California state law)

HAINBUCH hereby confirms compliance with the provisions of Proposition 65, the Safe Drinking Water and Toxic Enforcement Act of 1986 of the state of California. We guarantee that all of our products sold or marketed in California conform to the requirements of this regulation. This includes the provision of clear and intelligible warnings on products or their packaging that contain chemicals classified as carcinogenic or reproductive toxicants according to the latest research in California. We implement these measures with the goal of providing detailed information to our customers about potential risks, so they can make informed decisions about the products they use.

Our products currently contain no chemicals relevant to the regulation.

2017 / 821 / EU (Conflict resources)

HAINBUCH is typically not an importer of conflict resources. We do not purchase any materials directly from smelting plants. We do not directly process or purchase raw materials relevant to this regulation. Our Code of Conduct is available under Compliance at <https://www.hainbuch.com>

Dodd-Frank Act

HAINBUCH confirms to all customers in the United States of America who must comply with the requirements of section 1502 of the Dodd-Frank Act that our products contain no conflict resources relevant to the regulation. We do not directly process or purchase raw materials relevant to this regulation.

In general, the following applies: Our products contain no raw materials or substances that are declared as conflict resources or require registration.

Directive (EU) 2023/956 CBAM

HAINBUCH does not import goods, products, and services into the EU. We are therefore not obligated to reporting obligations for establishing a carbon border adjustment mechanism (CBAM) in accordance with Directive (EU) 2023/956.

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Supply chain due diligence

HAINBUCH is currently not directly subject to the Supply Chain Due Diligence (SCDD) Act. Nevertheless, it is our responsibility to promote and comply with positive social and ecological standards throughout our entire supply chain. In accordance with the SCDD Act, we hereby confirm that we are taking active measures to ensure that our business practices not only comply with current legal requirements, but also meet the expectations of our customers, employees, and society as a whole. These measures include:

- Obtaining recognition of and compliance with our standards for successful, long-term business relations.
- Comprehensive procedures for obtaining new suppliers.
- Risk analysis and assessment of our suppliers throughout our supply chain.
- Effective complaint mechanisms to ensure that concerns and violations can be efficiently addressed and resolved.
- Training of our employees and suppliers to promote an in-depth understanding of the importance of human rights and environmental protection in the supply chain.

Council Directive (EU) 833/2014 Import of Russian Steel

In the context of the sanctions of the European Union against Russia/Belarus, we ensure that Hainbuch complies with all applicable export control regulations and/or sanctions.

According to Art. 3 g, para. 1, letter d of Directive 833/2014, the import ban for iron and steel products also applies as of September 30, 2023 to products listed in Appendix XVII, provided that they have been processed in a third country using goods of Russian origin.

HAINBUCH is committed to fully supporting and implementing the EU restrictions in the company's own business activities and within the network of business partners.