

## DECLARATION OF RoHS CONFORMITY – 2025 UPDATE

Subject: Declaration of Conformity to the latest consolidated version of Directive 2011/65/UE (RoHS II/III), as amended by Delegated Directives 2024 e 2025.

### Main Regulatory References:

- Directive 2011/65/EU of the European Parliament and of the Council of, June 8, 2011 (RoHS II).
- Delegated Directive (EU) 2015/863 of the Commission (known ad RoHS III).

### 1. Standard Declaration of Conformity (Annex II)

Trancerie Emiliane S.p.A. declares under its sole responsibility that the products manufactured by us comply with the maximum concentration limits established in Annex II of Directive 2011/65/EU, which restricts the use of the following ten hazardous substances in homogeneous materials:

Substance	Max Threshold (MCVs)	Substance	Max Threshold (MCVs)
Lead (Pb)	0,1%	Polybrominated Biphenyl (PBB)	0,1%
Mercury (Hg)	0,1%	Polybrominated Diphenyl Ethers (PBDE)	0,1%
Cadmium (Cd)	0,01%	Bis (2-Ethylhexyl) Phthalate (DEHP)	0,1%
Chromium VI (Cr VI)	0,1%	Benzyl Butyl Phthalate (BBP)	0,1%
Dibutyl Phthalate (DBP)	0,1%	Diisobutyl Phthalate (DIBP)	0,1%

Our products, based on metallic alloys and other components, comply with the concentration limits listed on the chart above.

### 2. Conformity and Update to the New Delegated Directives (2024-2025)

Trancerie Emiliane S.p.A. is aware that maintaining compliance requires continuous monitoring of updates to Annexes III and IV of the RoHS Directive, which govern exemptions. We hereby confirm that we have integrated the analysis and implementation of the fundamental regulatory changes, published between 2024 and the end of 2025:

#### A. Restructuring of Lead (Pb) Exemptions

Following the publication of Delegated Directives (EU) 2025/2364 and (EU) 2025/1802 on November 21, 2025, which amend the exemptions regarding Lead (Annex III, entries 6 and 7):

- Lead in Metallic Alloys (Entries 6(a), 6(b), 6(c)):** We confirm that the eventual use of Lead in steel and aluminum alloys applies to the extended and specified application areas of the new Directives, with an expiration date set for June 30, 2027 for all relevant EEE categories.
- Lead in High Melting Temperature Solders (Entry 7(a)).** We have updated our internal documentation in accordance with the fragmentation of the previous generic exemption 7(a). The generic version of this exemption shall cease to apply on June 30, 2027. Any future use of Lead in solders will be justified only and exclusively by the new and specific sub-entries (7 (a) –I to 7(a)-VII), the validity of which is extended until December 31, 2027.

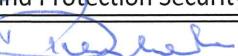
#### B. Cadmium (Cd) Exemption Update

We confirm that we have acknowledged the Delegated Directive (EU) 2024/1416, regarding exemption 39. The application of transitional exemption 39(a) will expire on November 21, 2025 for all EEE categories (Electrical and Electronic Equipment). The company guarantees that the processes and materials used for its products are not subject to the expiring exempted Cadmium applications.

#### C. Intersection with the POPs Regulation (PBDE)

We are aware of the importance of aligning RoHS compliance with Regulation (EU) 2019/2021 on Persistent Organic Pollutants (POPs). Specifically, Delegated Regulation (EU) 2025/1482 establishes more restrictive limits for Polybrominated Diphenyl Ethers (PBDE) in recovered/recycled material:

- Effective from December 30, 2025, the concentration limit for the sum of PBDEs will decrease to **350 mg/kg (0,035%).** As this limit (350 ppm) is more restrictive than the RoHS threshold (1000 ppm), Trancerie Emiliane S.p.A. commits to ensuring the secondary material used complies with the stricter requirement of the POPs Regulation, thus guaranteeing the highest level of environmental protection.

Authorized Representative:	Approving Authority:
Vincenzo Di Grandi	Roberto Bardini
Prevention and Protection Security Officer	Prevention and Protection Security Manager
Signature: 	Signature: 