

Technisches Produkt Management

Stand

15.05.2025

### **Declaration of Conformity**

#### A) Declaring companies

#### **GLEICH Aluminium GmbH**

Kirchhoffstraße 2, 24568 Kaltenkirchen, Germany

#### **GLEICH Aluminiumwerk GmbH & Co.KG**

Kirchhoffstraße 2, 24568 Kaltenkirchen, Germany

#### **GLEICH Aluminium Service-Center GmbH & Co.KG**

Hans-Stockmar-Straße 3, 24568 Kaltenkirchen, Germany

#### **GLEICH Aluminium Service-Center Ost GmbH**

Am Amselberg 1, 99444 Blankenhain, Germany

#### **GLEICH Aluminium s.r.o.**

Rochliká 1799, 463 11 Liberec 30, Czech Republic

#### **GLEICH Aluminium Sp. Zo.o.**

ul. Powstańcáw Wielkopolskich 1 - 5, 62-800 Kalisz, Poland

#### **GLEICH USA Inc.**

800 Battery Avenue, Suite 100, Atlanta, GA 30339, USA

#### MEKO Metallkomponenten Ges.m.b.H

Triester Straße 447a, 8055 Graz, Austria

Below called "GLEICH"

#### B) Prologue

All products, sold by the GLEICH - Group correspond to the applicable product-specific parameters/regulations of the European Union and the appropriate German specifications.

#### C) Declaration of Conformity of Our Products with the EU Directives

The products delivered by GLEICH as a whole panel / cut to size (semi-finished products) or as finished components made of:

#### Aluminium Cast Plate, both side milled, PVC on both sides

G.AL° C250 (EN AW-5083), G.AL° C250 ELOXPLUS (EN AW-5083), G.AL° C330 (EN AW-7021)

#### Aluminium Cast Plate, six-side sawn

G.AL<sup>®</sup> C210R (EN AW-5083), G.AL<sup>®</sup> C330R (EN AW-7021)

#### Aluminium Special Cast Plate, six-side sawn

G.AL<sup>®</sup> C210 DYNAMIC (EN AW-5083), G.AL<sup>®</sup> C330 DYNAMIC (EN AW-7021)

#### Aluminium Precision Rolled Plate, both-side milled, PVC on both sides

ALPLAN® 7075 (EN AW-7075), UNIDAL® (EN AW-7019)

#### **Aluminium Rolled Plate**

EN AW-5754, EN AW-5083, EN AW-6082, EN AW-7022, CERTAL® (EN AW-7022), EN AW-7075

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#### **Aluminium Round Bars**

EN AW-6082, EN AW-7075

do not contain any substances in concentrations that would exclude our products from marketing due to amounts or volume by percentage, stated as bans or restrictions in the following guidelines, according to our current state of knowledge.

#### **G.AL®-Products Notes**

G.AL® products are manufactured exclusively without the use of radioactively contaminated material (radioactively contaminated secondary aluminium) and varying amounts primary aluminium. The share of secondary aluminium is depending on the product 40 - 85%.

#### Note on point C

The products named under "C" do not contain any substances that are subject to the restrictions or prohibitions of the directives mentioned below.

Products sold by GLEICH are not subject to any exceptions according to ElektroG.

#### D) EU-Directives

### Directive RoHS 2011/65/EG from 08-06-2011 incl. amendment II from 22-07-2019 Directive EU 2015/863 from 31-03-2015

Previously RoHS 2002/95/EU from 27-01-2003 with consideration of the verdict of the EGH from 01-04-2008 (RoHS - Directive 2002/95/EC [BGBI 1, 2005/762]).

#### **Explanatory Note**

In reference to the above mentioned products, GLEICH are downstream user. All responsible upstream suppliers have been asked to fulfil their responsibility according the EU-guideline in line with this guideline.

The products delivered by GLEICH under point C do not contain any substances listed on the SVHC-list.

#### **Protective PVC on precision plates**

Concerns only the Polyethylene (PE) protective film on precision plates: Annex XVII, entry 51: paragraph 4a applies.

#### Directive 2002/96/EG from 01-27-2003, Rev. 11-03-2008

(WEEE 1 - Directive 2002/96/EC)

#### Directive 2012/19/EU from 04-12-2012

(WEEE 2)

#### Directive 2000/53/EG from 18-09-2000 incl. amendment from 30-03-2023

(ELV - Directive 2000/53/EC)

#### Directive 1272/2008 (CLP / GLS) from 31-12-2008, Rev. 10-12-2024

(Classification, packaging and identification of hazardous materials)

#### Directive (EG) 1907/2006 (REACH) from. 18.12.2006, Rev. 01-04-2025

(Registration, Evaluation, Authorization and Restriction of Chemicals substances)

#### Directive 2006/122/EG from 12-12-2006 and 2007/51/EG from 25-09-2007

(Amendment of directive 76/769/EWG for the marketing and use of certain hazardous substances and preparations)



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#### **EU Regulation 2019/1021 (EU-POP Regulation)**

The semi-finished products mentioned under C), as well as the coolant lubricants used in the manufacturing process (potential residues of these on the non-laminated surfaces of the semi-finished products mentioned under C), and the protective film (PE) applied to G.AL® precision plates, do not contain any persistent organic pollutants (POPs); therefore, they are not affected by EU Regulation

2019/1021.

#### EU Regulation 2024/590 (Ozone Regulation (EU)):

The semi-finished products referred to under point C), as well as the cooling lubricants used during manufacture (which may potentially leave residues on the uncoated surfaces of the semi-finished products referred to under C)), and the protective film (PE) used on G.AL® precision plates, do not contain any substances listed in Annex 1 of EU Regulation 2024/590.

#### Directive 2009/428/ "Dual use goods" from 01-09-2013 and 1382/2014 from 30-12-2014

The above mentioned goods, delivered by GLEICH, do not represent material that are subject to EU regulation 428/2009 from 01-09-2013 "Dual use goods" and 1382/2014 from 30-12-2014.

#### Exceptions according to 1C202, Point a

Rings and Discs of Rolled Plate EN AW 7022, CERTAL®, EN AW 7075, G.AL® 7075GF, ALPLAN® 7075, and Aluminium-Roundbars EN AW 7075 with diameter ≥75 mm.

#### Dodd-Frank Act (DFA) Sec. 1502, 3TG-Minerals (Conflict minerals)

Conflict minerals: Tantalum (Ta), Tin (Sn), Tungsten (W), Gold (Au).

The material mentioned under c) do not contain any materials listed in the Dodd-Frank Act list / 3TG-Regulation.

For production none materials are used, that have been won under disregard of social, ethnic or international law, or which underlie the ban of child labour.

#### Directive (EU) 2017/821 from 17-05-2017

As a downstream company GLEICH is not subject to the obligations / verification management of Regulation (EU) 2017/821 of May 17, 2017.

#### E) Supplemental Statement / Voluntary Restriction

The products stated under C) do not contain any:

- polycyclic aromatic hydrocarbons (PAK, PAH)
- decabromodiphenylether (DecaBDE)
- polyorganosiloxane (Silicone)
- polybrominated biphenyls (PBB)
- polybrominated diphenyl ether (PBDE)
- exavalent chromium (Chromium[VI], Cr[VI], Cr6+)
- cadmium (Cd)
- mercury (Hg)
- lead (Pb) with >0.1%.

#### E1) USA - Toxic Substances Control Act (TSCA) Regulation

The semi-finished products mentioned under C), as well as the coolant lubricants used in the manufacturing process (potential residues of these on the non-laminated surfaces of the semi-finished products mentioned under C), and the protective film (PE) applied to G.AL® precision plates, do not contain any of the substances prohibited under the TSCA.

### E2) Raw material input from Russia for the production of G.AL® products and materials from Constellium

In the production of the G.AL® products mentioned under C) and for the materials ALPLAN® 7075, UNIDAL®, and CERTAL® (materials from Constellium), no primary or secondary metal (scraps, chips, remelted metal, etc.) from Russian or Belarusian production or trade with Russia or Belarus is used.

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#### E3) Regulation of PFAS (ECHA dossier dated 22-03-2023)

The semi-finished products mentioned under C) as well as the coolant lubricants used in the production of G.AL® products (potential residues of these on non-laminated surfaces of the G.AL® products mentioned under C)), as well as the protective film (PE) on G.AL® precision plates, do not contain Perand Polyfluorinated Alkyl Substances (PFAS).

#### E4) California Proposition 65 – "Safe Drinking Water and Toxic Enforcement Act"

The semi-finished products mentioned under C), as well as the coolants and lubricants used in the manufacturing of G.AL® products (potential residues of these on uncoated surfaces of the G.AL® products mentioned under C)), and the protective film (PE) used on G.AL® precision plates do not contain any alloy components or substances that are listed on the OEHHA website (https://oehha.ca.gov/proposition-65/proposition-65-list) and known to the state of California to be carcinogenic and/or reproductive toxicants. We review this list once a year, as of June 30th, for new substances. If new substances that are also alloy components of the semi-finished products we supply are added to the list, we will inform you immediately.

In this context, we would like to emphasize once again that this applies only to the products mentioned above as delivered by us. We cannot provide information on whether the final product is a consumer product and may require a CP65 warning label, as we are an upstream semi-finished product supplier. It is the responsibility of the manufacturer/distributor of the final consumer product to check and comply with the warning requirement.

### E5) Regulation on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (Ordinance on Substances in Electrical and Electronic Equipment) From 19-04-2013, Rev. 10-08-2021

The semi-finished products listed under section C) do not contain any substance:

- 1. In concentrations exceeding 0.1% by weight per homogeneous material:
  - a) Lead
  - b) Mercury
  - c) Hexavalent chromium
  - d) Polybrominated biphenyls (PBB)
  - e) Polybrominated diphenyl ethers
  - f) Di(2-ethylhexyl) phthalate (DEHP)
  - g) Butyl benzyl phthalate (BBP)
  - h) Dibutyl phthalate (DBP)
  - i) Diisobutyl phthalate (DIBP)
- 2. In concentrations exceeding 0.01% by weight per homogeneous material:
  - a) Cadmium

#### F) Transferability of the Declaration of Conformity

A transfer of the GLEICH declaration of conformity to national regulations, specifications, provisions, directives and/or laws of states that do not belong to the European Union [third countries] is permissible if the regulations, specifications, provisions or laws of the third country specify the same value limits, exclusions and permissions of the substances like those that are valid in the European Union.

#### F1) Specialty "China-RoHS-Directive SJ/T 11363-2006"

If a congruency with the RoHS - Directive 2002/95/EC regarding hazardous substances and the limiting values is given, our declaration of conformity corresponds with the Chinese RoHS SJ/T 11363-2006, last update: 11-07-2007.

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#### **Explanatory Note**

However, the China-RoHS contains the addition "other toxic and harmful substances or elements provided by the state". This addition allows the Chinese legislature the direct inclusion of additional substances in the RoHS <u>without</u> the need to create a revised version and therefore without carrying out an announcement or giving a prior notice.

Through this, our declaration of conformity has only a temporary effectiveness and validity in regards of the China-RoHS.

#### **G) Important Notes**

GLEICH particularly exclude a continuous update of this declaration of conformity in regards of specifications, parameters, regulations, directives and / or laws of third party countries.

GLEICH also particularly exclude a certification of our company, our products and materials and/or labelling of the products and materials regarding a third party country's RoHS or specifications, parameters, regulations, directives and / or laws of a third party country.

This declaration of conformity applies only to the above mentioned products in their entirety. We strictly exclude a declaration of conformity regarding customer-related identifications such as drawing numbers, item/article numbers, component identifications, etc.

We point out in particular, that this declaration of conformity applies only for products that are unaltered in their preparation and their internal form of appearance (material structure).

Alterations in their preparation and their internal form of appearance, executed after the transfer of risk, will void this declaration immediately.

Additives and materials of any kind that are added to or into the production process of the user, intentional or unintentional, also void this declaration.

If it is not clear if a banned substance was added to the product before or after the transfer of risk, an accredited material-testing laboratory will be assigned the duty to clarify the matter. The cost of this examination is carried by the party that is responsible for the pollution /contamination with the banned substance.

This declaration of conformity does not constitute a quality guarantee according to § 443 BGB. All exemptions from liability, agreed upon in our General Conditions of Export as basis for all our delivery relations, remain untouched by this declaration; § 444 BGB does not apply. All other claims against us, due to defects of our products resulting from false or incomplete confirmation of the conformity, remain effective, § 437, § 309 8b BGB.

G.AL is a registered trademark of the GLEICH Aluminium GmbH, Kaltenkirchen, Germany. CERTAL, UNIDAL are registered trademarks of the CONSTELLIUM Valais SA, CH.

#### H) Validity / Exclusion / Effectiveness

This document applies exclusively to the products named under "C" in their entirety.

A declaration of conformity with regard to customer-related designations, such as drawing numbers, article numbers, component designations, etc., is inadmissible and is explicitly excluded.

This document is generated electronically and valid without signature.

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