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Declaration of Compliance with Regulation (EU) 2019/1021 on Persistent Organic Pollutants (POPs)

SRM Mikroelektronik GmbH

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1. Scope of this Declaration

This declaration applies to the electronic manufacturing services provided by our company on behalf of our customers, including the procurement and processing of electronic components and materials as well as the processing of customer-supplied items (“consigned parts”).

This document **does not constitute a declaration of conformity for any finished product.**

2. Compliance with Regulation (EU) 2019/1021 on Persistent Organic Pollutants

Based on the information currently available to us and on the conformity documentation provided by our suppliers, we hereby confirm that **no substances listed as banned or restricted persistent organic pollutants (POPs)** in Regulation (EU) 2019/1021 are intentionally used or added in the materials we procure and process.

This specifically includes, but is not limited to, the following substance groups:

- Pentabromodiphenyl ether (PentaBDE)
- Octabromodiphenyl ether (OctaBDE)
- Decabromodiphenyl ether (DecaBDE)
- Hexabromocyclododecane (HBCDD)
- Perfluorooctane sulfonic acid (PFOS) and related compounds
- Perfluorooctanoic acid (PFOA) and related compounds
- Perfluorohexane sulfonic acid (PFHxS) and related compounds
- Short-chain chlorinated paraffins (SCCP)
- as well as all other substances listed in the annexes of Regulation (EU) 2019/1021.

3. Basis of Assessment

Our assessment is based on:

- **Supplier declarations** regarding POP, REACH, and RoHS compliance
- **Material declarations**, where available (e.g., IPC-1752A or equivalent)
- **Risk assessments**, particularly regarding plastic materials in components
- **Document reviews** performed within the framework of our quality management system

Routine **analytical testing** is not performed unless explicitly ordered by the customer.

4. Customer Responsibility for Consigned Materials (Customer-Supplied Parts)

4.1 Customer responsibility

The customer assumes **full and exclusive responsibility** for ensuring that all materials, components, assemblies, or other items supplied by the customer (“consigned parts”) comply with Regulation (EU) 2019/1021 on persistent organic pollutants, as well as all other applicable regulatory requirements (including REACH and RoHS).

4.2 Customer confirmation

The customer confirms that the consigned parts **do not contain any banned or restricted POP substances**.

4.3 No obligation for the EMS provider to verify compliance

The EMS provider is **not obliged** to verify the regulatory conformity of consigned parts. Standard incoming inspections are limited to **identity and visual checks** and do not include chemical or regulatory verification.

4.4 Provision of documentation

Upon request, the customer agrees to provide **all necessary compliance documentation** related to the consigned parts.

4.5 Indemnification

The customer shall indemnify and hold the EMS provider harmless from **any claims, damages, or regulatory actions** resulting from non-compliance of the consigned parts with POP, REACH, or RoHS requirements.

5. Limitations of this Declaration

This declaration:

- applies only to the materials and components processed by us,
- does **not** confirm POP compliance of any final product,
- does **not** replace the legal responsibilities of the customer or any entity placing the product on the market,
- is based on the **current version** of Regulation (EU) 2019/1021 and the documentation available at the time of issuance.

Berlin, 09.04.2026

Dominik Schmidt
Geschäftsführer