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Performance Coatings International Laboratories, LLC, dba “PCI Labs”

600 Murray Street, Bangor, PA 18013, USA

PCI Labs manufactures high-quality UV-curable products; chemical preparations (coatings) and homogenous coated material articles, that all meet international environmental regulations, including EU Directive (EU) 2015/863 (RoHS), the European Union’s Regulation (EC) 1907/2022 (REACH), IEC 62474, EU Waste Framework Directive (SCIP), EPA TSCA Section 6(h) and California’s Proposition 65 Declarations.

All PCI Labs products contain NO Per and Polyfluoroalkyl (PFAS) and Perfluoro Octane Sulfonate (PFOS) substances.


PCI Labs is a toll coater for hard-coated consumer injection molded or sheet products, that are non-hazardous and are classified as articles. Articles are not subject to the Occupational Safety and Health Administration’s Hazard Communication Standard (29 CFR 1910.1200(b)(6)(v)), which apply only for “hazardous chemicals in the workplace.” As defined in this standard: “Article” means a manufactured item other than a fluid or particle: (i) which is formed to a specific shape or design during manufacture; (ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and (iii) which under normal conditions of use does not release more than very small quantities, e.g., minute or trace amounts of a hazardous chemical, and does not pose a physical or health risk to employees. **Furthermore, all PCI Labs coated customer supplied injection molded or sheet parts, are considered “articles,” and under the Global Harmonized System are exempted from the GHS Labeling and SDS classification criteria.**

DFARS SPECIAL METALS COMPLIANCE

Defense Federal Acquisition Regulation Supplement is a supplement to the FAR (Federal Acquisition Regulation) that provides U.S. Department of Defense (DoD) specific acquisition regulations that DoD government acquisition officials – and those contractors doing business with DoD – must follow in the procurement process for goods and services. Included in DFARS are several requirements including specialty metals acquisition restrictions. **PCI Labs does not use any specialty metals in any of their chemical preparations and all PCI Labs products are in full compliance.**

ROHS COMPLIANCE

All PCI Labs products are RoHS compliant. All chemical preparations and homogeneous material articles are compliant and marked as RoHS compliant. RoHS Compliant means that the substances restricted by EU Directive 2015/863/EC and subsequent amendments of the European Parliament, are not contained in a

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finished product above threshold limits, unless the restrictive substance is subject to an exemption provided in the RoHS-10 Directives.

Compliance of PCI Labs' products and services with RoHS and REACH regulations is affected through:

- Controlling the materials used in our products.
- Periodic audits of our suppliers to ensure compliance.
- Supplier compliance statements.

ROHS-3 (ROHS-2025 UPDATED)

Directive 2011/65/EU of the European Parliament, June 8, 2011, on the restriction of the use of certain hazardous substances in electrical and electronic equipment (EEE) became effective on January 3, 2013. Some of the provisions of Directive 2011/65/EU were phased out, and new provisions were amended in EU Directive 2015/863/EU (RoHS-3.) PCI Labs meets all requirements of RoHS-10, Chemical Abstract Service (CAS) chemicals, dated as of July 22, 2021, including category 12 restricted substances. It includes the 2023 proposed tetra-bromo-bisphenol A (TBBPA) and medium-chain chlorinated paraffins (MCCPs). Adding TBBPA and MCCPs would increase the number of restricted substances under EU RoHS from 10 to 12. **PCI Labs products are compliant with RoHS Directive 2024/232, as amended January 30, 2024.**


REACH COMPLIANCE (2025 UPDATED)

In June 2007, the European Union Regulation (EC) 1907/2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) was first released. This Regulation establishes specific duties and obligations for companies in the European Union (EU) that manufacture or import substances on their own, in preparation for these articles.

Under the REACH EC Regulation 1907/2006, Title II, Chapter 1, Article 7.1(a) & (b), PCI Labs is a contract manufacturer and supplier of homogeneous material coated "articles" to our customers. We do not manufacture, or supply "substances" and coated articles that cause the "intentional release of substances". Accordingly, we foresee no registration or pre-registration requirement for the products and services we provide, according to Articles 59(10), 7, 31 and 33.

PCI Labs is constantly monitoring the substances of very-high concern (SVHC) as defined by REACH, in our products. This will be an ongoing process since the complete list of SVHCs is released in stages.

Customers are encouraged to visit the following site to get the most up-to-date information on the current list of SVHCs under REACH. echa.europa.eu/candidate-list-table.

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Based on communication with our raw material suppliers, we conclude that to the best of our knowledge all PCI Labs products requiring REACH compliance do not contain any of the currently listed SVHC in concentrations greater than 0.1% w/w. We will communicate with customers should this position change.

All PCI Labs products are REACH compliant, based upon revisions to SVHC candidate list as of January 25, 2025 (250 SVHCs.)

US TOXIC SUBSTANCES CONTROL ACT (TSCA), Section 6 COMPLIANCE (January 2025)

PCI Labs declares that all UV-curable coatings sold do not contain any restrictive substances found under TSCA, Section 6.

PCI Labs is in full compliance, as none of the five Persistent, Bio-accumulative, and Toxic (PBT) chemicals under EPA's 15 U.S.C §2601, TSCA, Section 6(h), DecaBDE, PIP 3:1, 2-4-6-TTBP, HCBd and PCTP and the upcoming in 2022/2023 ten (10) more TSCA prioritized risk-management chemicals (Asbestos, Lead, PCBs, PV29, HBCD, NMP, TCE and others) regarding their use and risk management, are present in any of our chemical products and/or used in our facility. **Updated as of January 2025.**

CALIFORNIA PROPOSITION 65 DECLARATION

PCI Labs products do not contain chemicals which are listed in the California Safe Drinking Water & Toxic Enforcement Act of 1986 and are fully compliant.


The act commonly known as Proposition 65 (Prop 65,) establishes a list of chemicals which the State of California risk assessment process has determined to present a risk of cancer, birth defects or other reproductive harm. The Proposition 65 chemical list can be found at:

<https://oehha.ca.gov/proposition-65>

PCI Labs will continue to monitor OEHHA Proposition 65 regulations for updates, full compliance, and disclosure. **Updated January 3, 2025, Proposition 65 List.**

PCI Labs is in full compliance with **EU Waste Framework Directive (SCIP.) Updated February 2025.**

The SCIP database was mandated on May 20, 2018, as part of an amendment to the EU WFD. The database has three main objectives: Decrease the generation of waste containing hazardous substances by supporting the substitution of substances of concern in articles placed on the EU market, including definitions of waste, recycling, and recovery.

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PCI Labs does not produce any products contained in the Candidate List of substances in a concentration above 0.1% that needs to be submitted to ECHA in a SCIP notification to allow safe use of the article placed in the EU market.

PCI Labs' products meet all RoHS10, REACH, EU Waste Framework, TSCA and California's Proposition 65 Directives and we manage information flow as required by these Regulations. PCI Labs' chemical preparations and homogeneous material coated articles - mostly customer supplied parts, - do not exceed minimum threshold limits established by the European Chemical Agency (ECHA), nor are sold in quantities greater than 1 ton/year and thus no further reporting is necessary.

IEC 62474 DECLARABLE SUBSTANCES LIST (DSL) – July 2023

IAEG- Aerospace and Defense Declarable List (AD-DSL V8.2) – March 2025

PCI Labs products are in full compliance with IEC 62474 Declarable Substance List and AD-DSL Reference List (IPC-1754.)

IEC 62474:2012 specifies the procedure, content, and form relating to material declarations for substance groups and declarable substances of companies operating in and supplying the electrotechnical (EEE) industry. **PCI Labs chemicals are not in the scope of this International Standard, are not expected to contain substances listed within the AD-DSL reference list, and if some traces of chemicals exist in extremely low levels, typically found in the industrialized world, shall be well below specified thresholds.**

Should you require more details on this process, please contact PCI Labs' Quality Assurance at 610-588-7900 or email us at quality@pcoatingsintl.com.

Signature: 

Name: George E. Drazinakis
President

Date: 7/3/2025

Phone: 610-588-7900