Regulatory Compliance Declaration

1. Overview

Wasatch Photonics is committed to compliance with applicable environmental, health, and safety regulations governing substances contained in our products. This declaration applies to Wasatch Photonics sites and product families including gratings, spectrometers, Raman systems, probes, and accessories.

2. EU RoHS Compliance (Directive 2011/65/EU + Amendments)

Wasatch Photonics products comply with Directive 2011/65/EU (RoHS 2) and Directive (EU) 2015/863 (RoHS 3).

Restricted Substances

- Lead (Pb) – 0.1%
- Mercury (Hg) – 0.1%
- Cadmium (Cd) – 0.01%
- Hexavalent Chromium (Cr^{6+}) – 0.1%
- PBB – 0.1%
- PBDE – 0.1%
- DEHP, BBP, DBP, DIBP – 0.1% each

Applicable Annex III Exemptions

- 6(a) Lead in steel (≤0.35%)
- 6(b) Lead in aluminum (≤0.4%)
- 6(c) Lead in copper alloys (≤4%)

Forward-Looking Statement

Wasatch Photonics continues evaluating alternatives to reduce reliance on expiring exemptions.

3. EU REACH Compliance (EC 1907/2006)

Wasatch Photonics complies with the applicable requirements of REACH Regulation (EC) No. 1907/2006 through supplier engagement, material declarations, and ongoing regulatory monitoring.

- Products are classified as Articles under REACH.
- No SVHCs above 0.1% w/w based on supplier declarations and current knowledge.
- Article 33 obligations will be met if applicable.
- Wasatch Photonics is a downstream user and has no REACH registration obligations.

4. Persistent Organic Pollutants (POPs) Regulation (EU) 2019/1021

Wasatch Photonics supports compliance with the EU POPs Regulation and monitors restricted persistent organic pollutants throughout the supply chain.

- Products are periodically reviewed as the POPs Regulation is amended.
- Supplier declarations are reviewed as part of the environmental compliance program.
- Products are not intentionally manufactured using restricted POP substances.

Compliance Status

Wasatch Photonics supports Regulation (EU) 2019/1021 and works to ensure products do not intentionally contain restricted POP substances above applicable limits.

5. PFAS (Per- and Polyfluoroalkyl Substances)

Wasatch Photonics monitors evolving PFAS requirements and works with suppliers to identify intentionally added PFAS where applicable.

- Material changes affecting PFAS are evaluated.
- Supplier disclosures are reviewed as regulations evolve.

Compliance Status

Wasatch Photonics monitors evolving PFAS regulations and works with suppliers to identify intentionally added PFAS where applicable.

6. IEC 62474 Declarable Substance List

Wasatch Photonics maintains declarable substance information using supplier declarations and engineering review to support customer requests.

- Declarable substance information is maintained to support customer requests.
- Supplier declarations are reviewed as available.

Compliance Status

Wasatch Photonics utilizes supplier declarations and engineering review to support compliance with IEC 62474 declarable substance requirements.

7. IPC-1752A Material Declaration Standard

Wasatch Photonics supports customer requests for IPC-1752A material declarations based on available supplier information and product data.

- Information is maintained through the product compliance process.
- Material declarations are supported using available supplier information.

Compliance Status

Wasatch Photonics supports customer requests for IPC-1752A material declarations where applicable based on supplier information and available product data.

8. U.S. TSCA Compliance

Wasatch Photonics products are considered articles under TSCA and are subject to applicable regulations.

- Products comply with applicable TSCA Section 6 restrictions.
- No intentional addition of restricted TSCA substances has been identified above regulatory thresholds.

9. California Proposition 65 Compliance

- Products are not expected to result in exposures above Proposition 65 safe harbor levels during normal use.
- Proposition 65 warning labeling is not required based on current information.

10. Conflict Minerals (Dodd-Frank Act, Section 1502)

Wasatch Photonics supports responsible sourcing of minerals.

- Reasonable Country of Origin Inquiry (RCOI) conducted.
- Products are not known to contain 3TG minerals that finance armed groups.
- Supplier reporting aligns with industry CMRT practices.

11. Basis of Declaration

- Supplier material declarations and certifications
- Internal engineering knowledge
- Established compliance and quality management systems

12. Limitations

This declaration is provided to the best of our knowledge based on information supplied by our supply chain and does not constitute a warranty of absolute material composition.

13. Authorized Signature

Jeff Taylor
General Manager
Wasatch Photonics
jtaylor@wasatchphotonics.com