

## Regulatory Compliance Declaration

Date: 4/20/2026

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### 1. Overview

Wasatch Photonics is committed to compliance with applicable environmental, health, and safety regulations governing the substances contained in our products. This declaration summarizes our compliance status based on supplier data, internal product knowledge, and established compliance processes.

Unless otherwise specified, this declaration applies to all Wasatch Photonics sites and product families, including gratings, spectrometers, Raman systems, probes, and associated accessories.

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

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

#### Restricted Substances

Products are compliant with maximum concentration limits for the following substances in homogeneous materials:

- Lead (Pb) – 0.1%
- Mercury (Hg) – 0.1%
- Cadmium (Cd) – 0.01%
- Hexavalent Chromium (Cr<sup>6+</sup>) – 0.1%
- Polybrominated Biphenyls (PBB) – 0.1%
- Polybrominated Diphenyl Ethers (PBDE) – 0.1%
- DEHP, BBP, DBP, DIBP – 0.1% each

#### Use of Exemptions

Certain components may rely on exemptions listed in **Annex III** of the RoHS Directive.

**“Applicable RoHS Annex III exemptions may apply to certain homogeneous materials or components. Known applicable exemptions include, but may not be limited to:**

- **Exemption 6(a)**- Lead in steel ( $\leq 0.35\%$ )
- **Exemption 6(b)**- Lead in aluminum ( $\leq 0.4\%$ )
- **Exemption 6(c)**- Lead in copper alloys ( $\leq 4\%$ )

The “6-series” exemptions are currently valid but is scheduled to **expire in June 2027** per EU delegated directives.

### Forward-Looking Statement

Wasatch Photonics is actively evaluating alternatives to eliminate reliance on expiring exemptions in alignment with regulatory timelines and customer requirements.

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### 3. EU REACH Compliance (EC 1907/2006)

Wasatch Photonics products are classified as **articles** under REACH.

#### SVHC Compliance

Based on supplier declarations and current knowledge:

- Products do not contain **Substances of Very High Concern (SVHCs)** above **0.1% weight by weight (w/w)**
- This statement is based on the **REACH Candidate List as published by ECHA as of February 4, 2026**

#### Article 33 Obligations

If any SVHCs above 0.1% w/w are identified in the future, Wasatch Photonics will provide required information in accordance with **Article 33**.

#### Registration Status

Wasatch Photonics is a **downstream user** and does not manufacture or import substances requiring registration under REACH.

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### 4. U.S. TSCA Compliance (Toxic Substances Control Act)

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

Based on supplier declarations and internal assessments:

- Products comply with applicable restrictions under **TSCA Section 6**, including **PBT substances** (e.g., PIP (3:1), DecaBDE, etc.)
  - No intentional addition of restricted TSCA substances has been identified above regulatory thresholds
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### 5. California Proposition 65 Compliance

California Proposition 65 regulates exposure to chemicals known to the State of California to cause cancer or reproductive harm.

Based on supplier data and product evaluations:

- Wasatch Photonics products are not expected to result in exposures above established **safe harbor levels** under normal and reasonably foreseeable use
  - Therefore, **Proposition 65 warning labeling is not required**
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## 6. Conflict Minerals (Dodd-Frank Act, Section 1502)

Wasatch Photonics supports responsible sourcing of minerals.

Based on supplier declarations and due diligence:

- A **Reasonable Country of Origin Inquiry (RCOI)** has been conducted
  - Products are not known to contain **conflict minerals (3TG)** sourced from covered countries that directly or indirectly finance armed groups
  - Supplier data is aligned with industry-standard reporting formats (e.g., CMRT)
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## 7. Basis of Declaration

This declaration is based on:

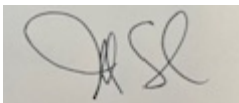
- Supplier material declarations and certifications
  - Internal engineering knowledge of product composition
  - Established compliance and quality management systems
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## 8. Limitations

This declaration is provided to the best of our knowledge at the time of issuance and is based on information provided by our supply chain. It does not constitute a warranty or guarantee of absolute material composition.

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## 9. Authorized Signature



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