

# SEI IDENTIFICATION SOLUTIONS

## SEI IDENTIFICATION SOLUTIONS LTD.

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November, the 26<sup>th</sup> 2024

## Statement of Compliance to Legal and Moral Requirements

There is a legal obligation for suppliers operating within or importing to the EU, selling product to USA and other part of the world, to inform their customers if any of their products do not comply with existing applicable environmental regulations. SEI Identification Solutions Ltd proactively contacts its suppliers and request them confirmation that none of their products contain substances above the thresholds required in the existing applicable environmental regulations.

In respect of the above, SEI Identification Solutions Ltd have not received any declarations that products supplied to us contain substances neither add any of these substances during its manufacturing process which contravene the regulations below:

- REACH Regulations - Articles 7, 31, 33 & 59(10) of Regulation No. 1907/2006 of the European Parliament Including updated substance of very high concern lists published the 7<sup>th</sup> of November 2024 in accordance with Article 59(10) of the REACH Regulation,
- RoHS Regulations - Article 4(1) of Directive 2011/65/EU including updated substance lists published on 1<sup>st</sup> November 2021 and 2015/863 of March 31<sup>st</sup>, 2015, of the European Parliament,
- Regulation (EU) 2019/1021 of the European Parliament and of the Council of June 20<sup>th</sup>, 2019, on persistent organic pollutants (POP).

To satisfy California Proposition 65 law updated February 25<sup>th</sup>, 2022, SEID is placing a warning label on any Product Safety Datasheet for those with chemicals level above the ones listed on the OEHHA list.

SEID is also compliant to the US-Environmental Protection Agency's TSCA, section 6(h) (86 FR 880, ban of 5 chemicals).

We would also like to make the following statement regarding the PFAS content in our family products.

- I. SKN, HTS, HTD, HTC, HTS, H-C, H-CR, H-HC, H-I, H-M, L-C,  
(Fluoropolymer type products in all colour, all size)
- II. SVT  
(Fluoro Rubber type product in all colour, all size)
- III. SDR,  
(Product in all colour, all size, containing fluoropolymer-based additives)
- IV. SH, SH/MIL, B20, DRD, SNH, NH(TW), LFH, LFD, LFC, SNH, SDW, W3NH, SCM2  
Types of IRRAX tube and Sumitube in all colour, all size)

The main components of I and II above fall under the definition of PFAS, and traces of PFAS can be found in III above, as additives falls under the definition of PFAS. However, all products comply with the current REACH



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regulations; the contents of banned or restricted substances or substances that are listed as SVHC are under the specific thresholds.

By adhering to the Sumitomo Electric Group Corporate Social Responsibility (CSR), SEI Identification Solutions Ltd is also complying to other legal and moral obligations like:

- European regulation EU 2017/821 and the Section 1502 of the US Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, all referring to Conflict of Mineral regulations,
- Part 6, Section 54 of the UK Public General Acts for Modern Slavery Act, enacted in 2015,
- The US International Traffic in Arms Regulations (ITAR) of March 9<sup>th</sup>, 2020, and the Export Administration Regulation (EAR99).

For and on behalf of:

SEI Identification Solutions Ltd

Patrick A. Ducruet Bindon-Blood  
Quality Manager

